



CITGO Petroleum Corporation

JAN 23 3 05 PM '84
DIV. OF LAND POLLUTION CONTROL
STATE BOARD OF HEALTH

Lake Charles Operations
Box 1562
Lake Charles, LA 70602

January 17, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, IN 46202

Re: Asbestos Material Disposal Permit;
Request for Extension

Dear Ms. Ruzicka:

This letter is to confirm our telephone conversation of today's date concerning the enclosed disposal permit issued to Indiana Waste Systems, Inc.

As we discussed, the Company is requesting a one (1) year extension of this approval as to permit disposal of approximately 75 cubic yards of asbestos contaminated soil from the idle refinery site located at 2500 East Chicago Avenue, East Chicago, Indiana. It is my understanding from our discussion, that a three (3) to four (4) week review period can be expected prior to granting said extension. Upon completion of your review, please inform me at the letterhead address.

In the interim, should you have any questions concerning this matter, please do not hesitate to contact me in Lake Charles, Louisiana at 318/491-6340 at your earliest convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental & Safety Specialist

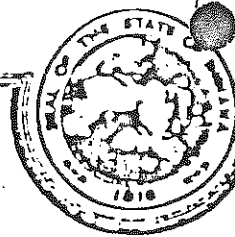
JSGJr/bm

Enclosure

xc: Messrs. C. A. Vincent, Jr.
R. V. Faith, Tulsa, OK
B. L. Reeder, East Chicago, IN
J. W. Swanson, CSOGC, Tulsa, OK
W. J. McCarthy, Dallas, TX

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

JUL 6 1983

Mr. Donald Ehmen
Indiana Waste Systems, Inc.
P.O. Box 181
Wheeler, IN 46393

Dear Mr. Ehmen:

Re: Disposal of Asbestos Waste from
Cities Service Company, 2500 E. Chicago
East Chicago, Indiana

This letter acknowledges the request for disposal dated June 17, 1983, from National Wrecking Company.

Approval is hereby granted for disposal of six (6) truck loads containing 40 cubic yards of asbestos waste at the Wheeler Landfill, OPP. No. 64-3, Porter County. The waste is to be mixed with solid waste and covered with a minimum of six inches of cover soil or solid waste immediately.

The approval is granted subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of the time of disposal and conditions of shipment.
2. Appropriate protective clothing should be used during handling and disposal to ensure proper protection from exposure to the material, especially from inhalation.
3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction and bagged in 6 mil plastic bags.
4. Bags should be labeled with a proper warning label stating: Caution--Contains Asbestos--Avoid Opening or Breaking Container. Breathing Asbestos is Hazardous To Your Health.
5. If nuisance or pollution conditions are created, immediate corrective action will be taken by the operator.
6. This approval will expire October 31, 1983.

This approval will be revoked if the landfill fails to maintain compliance with 320 IAC 5-1, et seq. (Regulation SPC-18). Any necessary local approval must be obtained from the Porter County Health Department.

If you have any questions, please contact Ms. Mary Janet Ruzicka of the Solid Waste Management Branch at 317/633-8527.

Very truly yours,

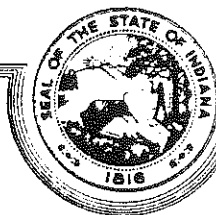

Ralph C. Pickard
Technical Secretary

MJR

cc: Mr. Archie H. Krugman, National Wrecking Company ✓
Mr. David Valinetz, Air Pollution
Porter County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206-1964

1330 West Michigan Street
P. O. Box 1964

Mr. Donald Ehmen
Indiana Waste Systems, Inc.
P.O. Box 181
Wheeler, IN 46393

JAN 31 1984

Dear Mr. Ehmen:

Re: Waste Disposal Approval Extension
for Asbestos Waste from
Cities Service Company, East Chicago

National Wrecking Company previously applied for approval to dispose of 40 cubic yards of asbestos waste at the Wheeler Landfill, OPP. No. 64-3, Porter County. The request was granted subject to certain conditions and with an expiration date of October 31, 1983.

This letter hereby extends the approval granted on July 6, 1983, for 75 cubic yards of asbestos waste subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of the time of disposal and conditions of shipment.
2. Appropriate protective clothing should be used during handling and disposal to ensure proper protection from exposure to the material, especially from inhalation.
3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction and bagged in 6 mil plastic bags.
4. Bags should be labeled with a proper warning label stating:
Caution--Contains Asbestos--Avoid Opening or Breaking Container.
Breathing Asbestos is Hazardous To Your Health.
5. If nuisance or pollution conditions are created, immediate corrective action will be taken by the operator.
6. Waste material accepted under this approval shall be included on the Special Waste Monthly Report to be submitted to this office monthly.
7. This approval will expire January 31, 1985.

This approval will be revoked if the landfill fails to maintain compliance with 320 IAC 5-1, et seq. (Regulation SPC-18). Any necessary local approval must be obtained from the Porter County Health Department.

If you have any questions, please contact Ms. Mary Janet Ruzicka of the Solid Waste Management Branch at AC 317/633-8527.

Very truly yours,

Ralph C. Pickard
Technical Secretary

MJR

AB-SpW

cc: Mr. John S. Grabowski, Jr., CITGO Petroleum Corporation
Mr. David Valinetz, Air Pollution
Porter County Health Department

12/6

TELEPHONE CALL REPORT

Date 8/24/84Time 9:00 AMFrom: Sheryl AtkinsTo: Art KawatachiHak ChoSubject Discussed Cities Services Co. TND 095267381
East Chicago, In.Summary

Hak Cho believed that EPA should handle closure of this facility - will talk to R. Shandross to be sure. May be Superfund site. Their current listing is 6 TSD (8) - closure candidate.

Action Required

Wait to hear from R. Shandross or Hak Cho concerning their decision about EPA completing closure. Requested documentation of decision.

Details

They are in violation of closure requirements under interim status. EPA has Part A, Acknow. of interim status 6/13/82, certified letter from Cities Serv. 6/24/83 (or 82) regarding shipment of all stored wastes off-site (Grabowski), R. Shandross (7/1/82) sent letter to Grabowski giving 90 days to resubmit another closure plan, due date was 10/1/82, no plan received, no EPA follow-up was done. EPA does have P.E. certification in their file, facility closed Jan. 1982. Kawatachi & Cho indicated that they may use P.E. certification to complete closure.

Followed up with call to G. Oliver - this site is Chris site due to asbestos & old oil refinery.

File in County _____

1C/b

TELEPHONE CALL REPORT

Date 8/24/84

Time 2:45 PM

From: Sheryl Atkins

To: Rich Shandross EPA

Herman A. Fritschen

Citeo
Serv
Co.

Subject Discussed Citeo Service Co. IND 095267381

Summary Could qualify for Policy 121. This terminal is adjacent to old E. Chicago refinery site covered under CERIS. Rich will send copies of his correspondence with company.

Action Required Check w/ G. Oliver to see if Ceris overlaps. Check w/ Jeff Stevens for financial filing of ownership status.

Details 9/83 sold Citeo Serv. to Citeo. If they have filed change of ownership or revised Part A to show change of ownership, Citeo would assume financial resp. If not, Citeo Service is financially resp.

File in County _____

TELEPHONE CALL REPORT

Date 9 / 4 / 84 Time 2:30
From: Sheryl Atkins To: Beji Melak
Subject Discussed Cities Service Co.

Summary Old oil refinery is part of present terminal. Refinery completely closed, terminal generator only. Tanks contain petroleum products & settled material (still bottom?) is cleaned out every 3-4 yrs by contractor and disposed of off-site.

Action Required Set up inspection with Dave Berrey & determine if Policy 121 can be used. Call Beji to set up time.
Details

File in County _____

Certified 471158
1A

CITIES SERVICE OIL AND GAS CORPORATION
BOX 300
TULSA, OKLAHOMA 74102

September 10, 1984

CERTIFIED RETURN RECEIPT REQUESTED

Ms. Sheryl Atkins
Indiana State Board of Health
Division of Land Pollution
1330 West Michigan Street
Indianapolis, Indiana 46206

Dear Ms. Atkins:

Petroleum Product Terminal
East Chicago, Indiana --
Hazardous Waste Activities

Enclosed are copies of six manifests for the period April 1981 through January 1982 as requested.

Concerning your request for hazardous waste closure plan for the subject site, Cities Service Company is not a storer of hazardous waste and therefore filing of a closure plan is not required. In order to clarify the status of the subject site, the following are sequence of events relating to hazardous waste activities at this site:

- On November 18, 1980, Cities Service Company submitted a permit application to store hazardous waste material in a steel tank with a maximum capacity of 149,100 gallons.
- The waste material contained within the tank was disposed of during the period April 1981 through January 1982 in a permitted off-site hazardous waste facility according to all applicable RCRA regulations. Copies of manifests are enclosed as per your request.
- On January 22, 1982, Haas & Associates, consulting engineers, inspected the above mentioned tank and certified that it had been satisfactorily cleaned. A copy of this letter is attached. Subsequent to the inspection, the storage tank was dismantled.

Ms. Sheryl Atkins
Indiana State Board
of Health

- 2 -

September 10, 1984

- On January 24, 1982, Cities Service Company advised the EPA Region V of the removal and disposal of the waste and submitted a copy of the Haas & Associates' inspection report.
- On August 31, 1983, the ownership of the property was transferred to CITGO Petroleum Corporation, and the EPA generator ID number was transferred from Cities Service Company to CITGO Petroleum Corporation (see attached). CITGO is a generator and does not store hazardous waste at this site.

Thus, Cities Service requests that the East Chicago petroleum product terminal be deleted from your hazardous waste storage facility list. Please advise me if you need further information to correct the status of this site concerning its hazardous waste classification.

Very truly yours,



Beji Malek
Environmental Coordinator

BM:ce

Enclosures

cc: Mr. J.S. Grabowski
CITGO Petroleum Corporation
Box 3758
Tulsa OK 74102

H.A. Fritschen - 1725 CSB

W/3074



HAZARDOUS WASTE MANIFEST

CWMA
NO 31274

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR CITIES SERVICE CO.	2500 E. CHURCH AVE EAST PHOENIX, AZ 85041	314-8134	1111111111111111
TRANSPORTER NO. 1 CITY OF PHOENIX	400 W. 123 PHOENIX, AZ 85001	314-8134	1111111111111111
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P.O. Box 55 Emelle, Alabama 35459	205-652-9531	A/L/T/O/O/O/6/2/2/4/6

WASTE INFORMATION

CONTAINER NO.	TYPE	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
5	DRUM	Hazardous Waste - Liquid Waste	1	DRUM	1111111111111111	AS-1111111111111111	2255

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531; GENERATOR — () US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Generator: [Signature] Title: [Title] Date: [Date]

This is to certify acceptance of the hazardous waste shipment described above:

Transporter #1: [Signature] Title: [Title] Date: [Date]

Transporter #2: [Signature] Title: [Title] Date: [Date]

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Disposer: [Signature] Title: [Title] Date: [Date]

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	

PRODUCER NO. 1



ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

112 31310

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR Cities Service, Inc.	2500 E. Chicago Avenue East Chicago, Ind. 46312	(219) 398-0734	1110095267311
TRANSPORTER NO. 1 Chemical Waste Management, Inc.	4300 W. 123rd Street Alsip, IL. 60659	(312) 396-1050	1600000315411
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	ALTO000622464

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
NO.	TYPE						
60	DRUMS	Hazardous Waste Liquid N.O.S.			100 2	RVD A54828	31,000 36-34
		(Waste Oil and Hydrochloric Acid Mixture)					

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531, GENERATOR — (219) 398-0734 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Cities Service, Inc. Generator J. L. Smith Title 12/3/81 Date

This is to certify acceptance of the hazardous waste shipment described above:

12/3/81 Transporter #1 J. L. Smith Title 12/3/81 Date

12/3/81 Transporter #2 J. L. Smith Title 12/3/81 Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

12/3/81 Disposer J. L. Smith Title 12/3/81 Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	60	SS	D81	14	11	1	41,780 lb

PRODUCER NO. 2



ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

31911

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR Cities Service, Inc.	2500 E. Chicago Avenue East Chicago, Ind. 46312	(219) 398-0734	1111111111111111
TRANSPORTER NO. 1 Chemical Waste Management	4300 W. 123rd Street Alsip, IL 60658	(312) 396-1050	1111111111111111
TRANSPORTER NO. 2			1111111111111111
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	AL100062246

WASTE INFORMATION

CONTAINER NO.	TYPE	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
600	DRUMS	Hazardous Waste Liquid NOS (Waste Oil and Hydrochloric Acid Mixture) Sulfuric	5000	GAL	D190 1111111111111111	RVD A54828	39.06
					1111111111111111		
					1111111111111111		
					1111111111111111		

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 ; GENERATOR — (219) 398-0734 US COAST GUARD 1-800-424-8802
SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Cities Service, Inc.
Generator
Dennis L. Meyer
Title
12-4-81
Date

This is to certify acceptance of the hazardous waste shipment described above:

L. H. Hume
Transporter #1
Dennis L. Meyer
Title
12-4-81
Date
Dennis L. Meyer
Title
12-4-81
Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

L. H. Hume
Disposer
Art R. Soper
Title
12-9-81
Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	600	55/dms	D81	14	18	1	41,080 lbs

PRODUCER NO. 2

74



ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

12 31312

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR Cities Service, Inc.	2500 E. Chicago Avenue East Chicago, Ind. 46312	(219) 393-0734	
TRANSPORTER NO. 1 Chemical Waste Management	4300 W. 123rd Street Alsip, IL. 60658	(312) 396-1050	
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	ALTOO062246

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
NO.	TYPE						
34	DRUMS	Hazardous Waste Liquid N.O.S. UN# 1832 Waste Oil and Hydrochloric Acid Mixture Sulfuric ID	1870	gal.	RD A 54828		22.13-

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 ; GENERATOR — (219) 393-0734 US COAST GUARD 1-800-424-8802
SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Cities Service Co. Generator James L. Jager Title 12/1/81 Date

This is to certify acceptance of the hazardous waste shipment described above:

Paul H. Jager Transporter #1 James L. Jager Title 12/1/81 Date

James L. Jager Transporter #2 James L. Jager Title 12/1/81 Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Paul H. Jager Disposer James L. Jager Title 12/1/81 Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	34	SS	12-21	14	19	1	

PRODUCER NO. 2

44



ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

dated per 40 CFR 263.10

34952

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR CITIES SERVICE 41300 W. 123134 ST ALBANY, IL 61710	2500 EAST CHICAGO AVE EAST CHICAGO, IN 46312	(219) 398-0734	11M114111-111111
TRANSPORTER NO. 1 A. HENNING WASTE MGMT	41300 W. 123134 ST ALBANY, IL 61710	(317) 396-1151	11M114111-111111
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	AL11000622464

WASTE INFORMATION

CONTAINER NO.	TYPE	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
1	DRUM	HAZARDOUS WASTE SOLIDS - ALK	20	DRUMS	111111	454128	3310
		DRUM - E			111111		
					111111		
					111111		

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 ; GENERATOR — (219) 398-0734 US COAST GUARD 1-800-424-8802
SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Generator: Colony Service Co Title: Owner Date: 1-17-82

This is to certify acceptance of the hazardous waste shipment described above:

Transporter #1: Driver Title: DRIVER Date: 1/21/82
Transporter #2: _____ Title: _____ Date: _____

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Disposer: Emelle Facility Title: Emelle Facility Date: 1-27-82

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
	1	DRUM	T45-DE4	14"	SOLID		34 860 lbs
							Washed D-Trip, 20 min

PRODUCER NO. 2



ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

dated 10/10/92

34953

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR CITIES SERVICE	2500 E. CHAS. AVE. EAST CHAS. ALA 36312	(214) 378-0734	11111111111111
TRANSPORTER NO. 1 CHEMICAL WASTE MGMT	4300 W. 103RD ST ALSO, AL 36159	(214) 378-1057	11111111111111
TRANSPORTER NO. 2			11111111111111
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	A/L/T/O/O/O/6/2/2/4/6/4

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
NO.	TYPE						
1	DRUM	HAZARDOUS WASTE SOLID - N.O.S.	18	DRUMS	11111111111111	K001 ACID	2500
		IRON - F			11111111111111		

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531; GENERATOR — (214) 378-0734 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Generator: Charles E. Smith Title: Owner Date: 10/10/92

This is to certify acceptance of the hazardous waste shipment described above:

Transporter #1: Charles E. Smith Title: Owner Date: 10/10/92

Transporter #2: _____ Title: _____ Date: _____

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Disposer: Charles E. Smith Title: Owner Date: 10/10/92

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	1	Drum	D81	14	23		33180 lbs
							20 94 yds

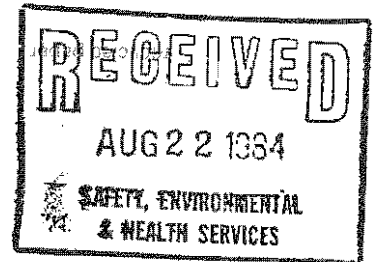
PRODUCER NO. 2 2 * 10 min @ WMA Rack

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

June 24, 1982



CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Waste Management Branch
U. S. Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

ATTN: Mr. Karl J. Klepitsch, Jr.
Chief

Re: RCRA Activities - Hazardous
Waste Storage Permit Application
East Chicago, Indiana

Dear Mr. Klepitsch:

This letter is in reference to your correspondence dated June 13, 1982, to Mr. B. L. Reeder concerning the above-referenced permit application.

As you are aware, on November 18, 1980, Cities Service Company, pursuant to the U. S. EPA Hazardous Waste Management System Regulations, submitted this application to store a maximum of 149,100 gallons of oil-saturated waste material at the Company's petroleum product terminal located in East Chicago, Indiana.

It has since been determined that this hazardous waste storage facility is no longer required by the Company. Material remaining in storage was manifested and transported offsite to a permitted treatment facility, in accordance with all applicable hazardous waste regulations. Normal petroleum storage tank cleaning operations were conducted in January, 1982, to remove remaining waste residue. Also, as required, the tank was inspected by an independent registered professional engineer. A copy of the inspection letter is enclosed. Subsequent to the inspection, the storage tank was dismantled.

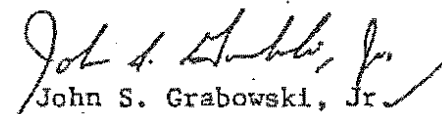
Therefore, Cities Service Company respectfully requests approval from the U. S. Environmental Protection Agency to close the above-referenced hazardous waste storage area. It should be noted, though, that the referenced terminal will remain a generator of hazardous waste

Waste Management Branch
U. S. Environmental Protection Agency
June 24, 1982
Page 2

in accordance with the hazardous waste activity notification originally submitted.

Should you have any questions concerning this request, please do not hesitate to contact me at 918/561-4076 at your convenience.

Sincerely,


John S. Grabowski, Jr.
Environmental Control and
Safety Coordinator

JSGJr:bh
Enclosure

bcc: Messrs. A. Neal
W. B. Mayberg
B. L. Reeder

44-4764

January 22, 1982

Cities Service Company
2500 E. Chicago Avenue
East Chicago, IN 46312

Attn: Mr. Bob Reeder

Re: Storage Tank #195 Inspection

Gentlemen:

In accordance with your request, we inspected the 15 ft. diameter by 15 ft. high steel tank which had formerly been lead lined. We found the tank to be empty and dry at the time of inspection. Enclosed is our application for payment.

Please contact this office if you have any questions regarding our inspection.

Very truly yours,



Patrick C. Haas, P.E.
Indiana P.E. License No. 7585

dn
Enclosure





UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

reded papaloe

REPLY TO ATTENTION OF
RCRA ACTIVITIES

JUN 13 1982

B. L. Reeder, Terminal Manager
Cities Service Company
P.O. Box 178
East Chicago, Indiana 46312

RE: Interim Status Acknowledgement
FACILITY NAME: CITIES SERVICE COMPANY

USEPA ID No. IND 095 267 381

Dear Mr. Reeder:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

A handwritten signature in dark ink, appearing to read "Karl J. Klepitsch, Jr.", is written over the typed name.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: R. Scott VanDyke

FACILITY NAME

EPA ID NUMBER

CITIES SERVICE COMPANY

IND095267381

FACILITY OPERATOR

CITIES SERVICE COMPANY

FACILITY OWNER

CITIES SERVICE COMPANY

FACILITY LOCATION

2500 EAST CHICAGO AVE
EAST CHICAGO

IN 46312

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

S02

149100.00000

G

*****KEY*****

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G OR L	GALLONS	G
TANK	S02	G OR L	LITERS	L
WASTE PILE	S03	Y OR C	CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G OR L	CUBIC METERS	C
DISPOSAL:			GALLONS PER DAY	U
			LITERS PER DAY	V
			TONS PER HOUR	D
			METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	GALLONS\HOUR	E
LANDFILL	D80	A OR F	LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	ACRE-Feet	A
OCEAN DISPOSAL	D82	U OR V	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	ACRES	B
TREATMENT:			HECTARES	Q
			POUNDS\HOUR	J
TANK	T01	U OR V	KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	METRIC TONS\DAY	S
OTHER	T04	J, R, N, S, U, V		



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

140095267361

REACKNO-LEDGEMENT

CITIES SERVICES COMPANY
PO BOX 300
TULSA

OK 74102

INSTALLATION ADDRESS

2500 E. WYCHICAGO AVE
EAST CHICAGO

JR 46312

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

May 16, 1983

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

U. S. Environmental Protection Agency
ATTN: Regional Director
Region V
230 South Dearborn
Chicago, Illinois 60604

Hazardous Waste Branch
ATTN: Mr. G. Doyle, Chief
Division of Land Pollution Control
Indiana State Board of Health
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Permit Transfer Request
2500 East Chicago Avenue
East Chicago, Indiana 46312

Gentlemen:

Cities Service Company desires to assign and transfer certain of its assets to its wholly-owned subsidiary, CITGO Petroleum Corporation. Cities Service Company is the current operator and permittee under the following-referenced permit and requests that the permit be transferred to CITGO Petroleum Corporation to show it as the operator and permittee.

The physical operations of the facility will continue to be operated by the same personnel subsequent to the transfer as before the transfer. However, the new mailing address for CITGO Petroleum Corporation is Post Office Box 3758, Tulsa, Oklahoma 74102.

Cities Service Company will remain responsible for all permit obligations, coverage and liability in connection with the following-referenced permit and facility occurring before receipt of the necessary regulatory agency's approval with respect to the transfer of such permit and operations.

May 30, 1983, is the specific date for transfer of permit responsibility, coverage and liability between Cities Service Company and CITGO Petroleum Corporation. On said date CITGO Petroleum Corporation will assure all permit responsibility, coverage and liability in connection with the following referenced permit.

The above is applicable to the hazardous waste generator identification No. IND095267361 issued to the referenced facility.



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

IND095267381

INSTALLATION ADDRESS

CITGO PETROLEUM CORP
PO BOX 300 ATTN BEJI MALEK
TULSA OK 74102

2500 EAST CHICAGO AVE
EAST CHICAGO IN 46312



CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

November 16, 1984

Mr. Norm Gray
Solid Waste Management Branch
Indiana State Board of Health
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal
Permit Request

Dear Mr. Gray:

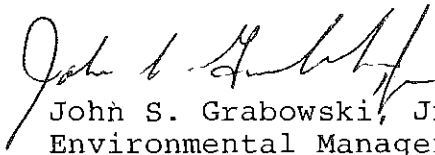
This letter is in reference to our telephone conversation of today's date concerning the Company request for a permit to dispose of approximately 1,700 cubic yards of oil-saturated dirt.

An analysis was performed on August 30, 1983 of this material pursuant to U.S. EPA EP toxicity procedures by the Company's in-house laboratory. Analytical results were reported as follows:

<u>Parameter</u>	<u>Concentration (ppm)</u>
Lead	1.70
Arsenic	0.02
Barium	2.65
Cadmium	<0.01
Chromium	0.90
Silver	<0.01
Selenium	<0.01
Mercury	0.02

Should you have any questions concerning this matter, please do not hesitate to contact me at 918/495-4764 at your convenience.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:mo

cc: Bob Faith
Ancal Neal
Bob Reeder



CITGO Petroleum Corporation

Lake Charles Operations
Box 1562
Lake Charles, LA 70602

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal Permit Request

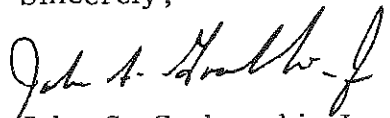
Dear Ms. Ruzicka:

This letter is to request that a permit be issued to Indiana Waste Systems, Incorporated, located in Wheeler, Indiana to dispose of approximately 1,700 cubic yards of oil-saturated dirt.

The material is located at the CITGO Petroleum Corporation bulk petroleum product terminal, 2500 East Chicago Avenue, East Chicago, Indiana. According to a waste analysis conducted by the Company, this material is not toxic pursuant to U.S. EPA EP toxicity procedures. Furthermore the material is not suspected of containing polychlorinated byphenyls (PCB) or similar halogenated hydrocarbons.

Should you require any additional information concerning this matter, please do not hesitate to contact me in Lake Charles, Louisiana at 318/491-6340 or in Tulsa, Oklahoma after May 21, 1984 at 918/495-4764 at your convenience.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:jv

MAY 11 11 04 AM '84
DIV. OF ENVIRONMENTAL CONTROL
STATE OF INDIANA



2DI

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

November 9, 1984

003859

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal
Permit Request

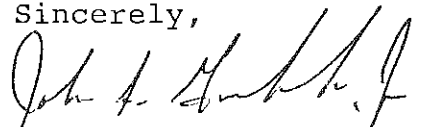
Dear Ms. Ruzicka:

This letter is in reference to my correspondence to you dated May 11, 1984 (copy enclosed).

To date the Company has not received a response to its request to dispose of approximately 1,700 cubic yards of oil-saturated dirt at the Indiana Waste Systems, Incorporated facility located in Wheeler, Indiana. A response to this request at your earliest convenience would be greatly appreciated.

Should you have any questions concerning this matter, please do not hesitate to contact me at 918/495-4764.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:mo

Enclosure

cc: Bob Faith
Jim Miller
Ancal Neal
Bob Reeder, w/encl.



CITGO Petroleum Corporation

Lake Charles Operations
Box 1562
Lake Charles, LA 70602

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal Permit Request

Dear Ms. Ruzicka:

This letter is to request that a permit be issued to Indiana Waste Systems, Incorporated, located in Wheeler, Indiana to dispose of approximately 1,700 cubic yards of oil-saturated dirt.

The material is located at the CITGO Petroleum Corporation bulk petroleum product terminal, 2500 East Chicago Avenue, East Chicago, Indiana. According to a waste analysis conducted by the Company, this material is not toxic pursuant to U.S. EPA EP toxicity procedures. Further, the material is not suspected of containing polychlorinated biphenyls (PCB) or similar halogenated hydrocarbons.

Should you require any additional information concerning this matter, please do not hesitate to contact me in Lake Charles, Louisiana at 318/491-6340 or in Tulsa, Oklahoma after May 21, 1984 at 918/495-4764 at your convenience.

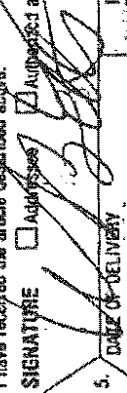
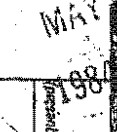
Sincerely,

John S. Grabowski, Jr.
Environmental Manager

JSGJr:jv

PS Form 3811, July 1982

RETURN RECEIPT

<p>• SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.</p>	
<p>(CONSULT POSTMASTER FOR FEES)</p> <p>1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery</p> <p>2. <input type="checkbox"/> RESTRICTED DELIVERY <small>(The restricted delivery fee is charged in addition to the return receipt fee.)</small></p> <p>TOTAL \$ _____</p>	
<p>3. ARTICLE ADDRESSED TO: Ms. Mary Janet Ruzicka P. O. Box 1984 Indianapolis, Indiana 46206</p>	
<p>4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> EXPRESS MAIL</p>	<p>ARTICLE NUMBER 6473</p>
<p>I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent </p>	
<p>5. DATE OF DELIVERY MAY 14 1984</p>	<p>POSTMARK <small>(may be on reverse side)</small> </p>
<p>6. ADDRESSEE'S ADDRESS (Only if requested)</p>	
<p>7. ONABLE TO DELIVER BECAUSE:</p> <p>7a. EMPLOYEE'S INITIALS</p>	

• GPO: 1982-379-553

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

- Print your name, address, and ZIP Code in the space below.
- Complete Items 1, 2, 3, and 4 on the reverse.
 - Attach to front of article if space permits, otherwise affix to back of article.
 - Endorse article "Return Receipt Requested"
 - adjacent to number.



PENALTY FOR PRIVATE USE, \$300

RETURN TO 

John S. Grabowski, Jr.
(Name of Sender)

P. O. Box 1562

Lake Charles, LA 70602
(Street or P.O. Box)

(City, State, and ZIP Code)

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

TO: RCRA file

DATE: March 4, 1985

FROM: Sheryl Atkins

THRU: TFG

SUBJECT: Cities Service Co. IND 095267381

Previous discussions with Rich Shandross & Hob Che of EPA indicated that, in reviewing this cos. closure plan submitted 6/28/82, EPA determined it to be deficient and requested a more detailed closure plan. The request was made 7/1/82 to John Grabowski of Cities Service and apparently was verbal. There was never any response to the request and EPA failed to follow-up on this one.

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: May 22, 1985

TO: Sheryl Atkins
Plan Review and Permit SectionTHRU: Dave Berrey
Terry GrayFROM: Ted F. Warner *TFW*
Compliance Monitoring SectionSUBJECT: Closure Inspection
Citgo Petroleum Corporation (Cities Service Company)
Hammond, Lake County

On April 8, 1985, I conducted a closure inspection at the above-referenced facility. Ms. Beji Malek and Mr. John Grabowski, Jr., represented the Company and provided me with a site inspection of the area where tank number 195 had been placed. I found no remaining signs of this tank, as well as no signs of soil stains.

Ms. Malek pointed out that the 149,000-gallon storage tank, number 195, had been cleaned and removed in 1982. This was the only tank used to store hazardous waste according to Ms. Malek.

I made a verbal request to Ms. Malek to submit a new closure plan and detailed certification as required by 40 CFR 265.112. Ms. Malek agreed to send in a new closure plan to our office to the attention of the Plan Review and Permit Section.

TFW/gds

#016811

Closure inspection
TSD RCRA Inspection Report

EPA Identification Number: 1 N D 0 9 5 6 7 3 8 1

Installation Name: Citgo Petroleum (Cities Service Company)

Location Address: 2500 E. Chicago Ave.

City: Hammond ZIP _____

Date of Inspection: 4-8-85 Time of Inspection 2:00 pm

Person(s) interviewed *	Title	Telephone
<u>List Attached</u>	_____	_____
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency	Telephone
<u>Ted F. Warner</u>	<u>ISBH</u>	<u>317/543-5111</u>
_____	_____	_____

* Please identify correspondence contact

Installation Processes by Process Code (EPA Form 3510-3)

S01 _____ Container storage	S02 <u>X</u> Tank storage <u>Ig. and Toxic</u>
S03 _____ Waste Pile storage	S04 _____ Surface impoundment storage
D79 _____ Injection well disposal	D80 _____ Landfill disposal
D81 _____ Land Application disposal	D83 _____ Surface Impoundment disposal
T01 _____ Tank Treatment	T02 _____ Surface Impoundment treatment
T03 _____ Incinerator treatment	T04 _____ Other

If Part A process codes are listed above as T04 please describe the process involved below.

Other activities

Generator _____

Appendix GN

Transporter _____

Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

0166m

11. Additional Comments

Ms. Biji Malek of the Cities Service Oil and Gas Corporation pointed out that the 149,000 gallon storage tank, number 195, had been cleaned and removed in 1982. This was the only tank used to store hazardous waste according to Ms. Malek.

I made a verbal request to Ms. Malek to submit a new closure plan and detailed certification as required by 40 CFR 265.112. Ms. Malek agreed to send in a new closure plan to our office in care of Ms. Sheryl Atkins, Plan review and permit section.

Ms. Malek and Mr. John Grabowski, Jr. provided me with a site inspection of the area where tank number 195 had been placed. I found no remaining signs of this tank as well as no signs of soil stains.

Telephone

Name & Company / Agency

KEN KRUEGER - ECOLOGY & ENVIRONMENT, INC.

12/663-9415 MARK LUNSFORD - E+E

18/561-3931 BEJI MALEK Cities Service

18/495-4764 John S. Grabowski ~~ES~~ Citgo Petroleum Corp.

17/243-5132 Harry Atkinson ISBH, DLPC

17/243-5124 Jacqueline Strecker ISBH, DLPC

17/243-5111 Ted Warner ISBH, DWPC

~~John Grabowski Citgo Petroleum Corporation~~

19/398-0734 Bob Reeder, Terminal Manager



file 1A

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

March 26, 1985

RECEIVED

MAR 28 1985

WMD-RAIU
EPA, REGION V

Mr. Karl J. Klepitsch, Jr., Chief
Solid Waste Branch
U.S. Environmental Protection Agency
Region V
RCRA Activities
P. O. Box A-3587
Chicago, Illinois 60690

Re: U.S. EPA Hazardous Waste
Generator

ID No. IND095267361 GTR PA-8


Dear Mr. Klepitsch:

This letter is to acknowledge receipt of your correspondence dated March 12, 1985 and addressed to owners and operators of hazardous waste treatment, storage or disposal (TSD) facilities.

A copy of this correspondence was sent to Citgo Petroleum Corporation's bulk petroleum product terminal located at 2500 East Chicago Avenue, East Chicago, Indiana. Please be aware that this operation is not a TSD facility.

Should you have any questions concerning this matter, please contact me at 918/495-4764.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:mo

cc: Jim Miller
Ancal Neal
Bob Reeder



CITIES SERVICE OIL AND GAS CORPORATION
P.O. BOX 300 TULSA, OKLAHOMA 74102

July 17, 1985

Mr. David D. Lamm, Director
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

JUL 18 4 04 PM '85
DIVISION OF LAND
POLLUTION CONTROL
STATE
BOARD OF HEALTH

Re: RCRA Closure Record Review
Cities Service Company
CITGO Petroleum Corporation
IND 095267381
Notice of Violation (V-114)

Dear Mr. Lamm:

This is in response to the above referenced Notice of Violation dated June 11, 1985. Pursuant to telephone conversation with Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, the response deadline was extended to July 19, 1985.

In 1980 when RCRA regulations became effective, as a result of past operations approximately 15,000 gallons of oily waste material being scheduled for disposal was stored in a 15 feet diameter x 15 feet high steel tank (Tank No. 195) at Cities Service Company Petroleum product terminal located in East Chicago, Indiana. It was Cities Service Company's (Company) belief that necessary arrangements and paperwork for the proper disposal of this waste material would extend beyond 90 days and therefore provisions of 40CFR 262.34(b) applicable to generators might be violated. To avoid such non-compliance, on November 18, 1980 Cities Service applied for a storage permit in lieu of requesting EPA for a time extension to dispose of the waste material. Further, the Company believed that full compliance with RCRA was being achieved by following the applicable sections in parts 262, 263 and 265 subpart (J)-tanks.

Our plan to dispose of the waste material was to secure an approved waste disposal contractor to remove the waste from the tank, place it in drums, clean the tank, haul and dispose of waste material at an approved disposal site and then remove the cleaned tank from the facility. On November 13, 1981 Chemical Waste Management Inc. (CWM) (4300 West 123rd Street, Alsip, Illinois 60658) was contracted by Cities Service to perform this work. Enclosed are CWM's proposal to perform the work and Cities Service Agreement with contractor (Attachment I). The waste removal, disposal and tank cleaning was completed in January 1982 (Attachment II CWM letter dated January 12, 1982). As required by regulations, an independent registered engineer Haas

Mr. David D. Lamm

- 2-

July 17, 1985

and Associates was retained to inspect the emptied tank. Their inspection verified that the tank was satisfactorily cleaned and dried. (Attachment III is their report letter dated January 22, 1982). The cleaned tank and its appurtenances were dismantled and removed from the site as scrap metal by National Wrecking Company in the summer of 1983 as part of its contract with Cities Service to complete demolition and cleanup work at the Cities Service idle East Chicago Refinery site. Attachment IV is a copy of the executed agreement between Cities Service and National Wrecking and includes Exhibit A Scope of the work, which specifies removal of the cleaned tank in paragraph (2)(c). The tank scrap metal was sold by National Wrecking to Scrap Corporation of America in Chicago, Illinois.

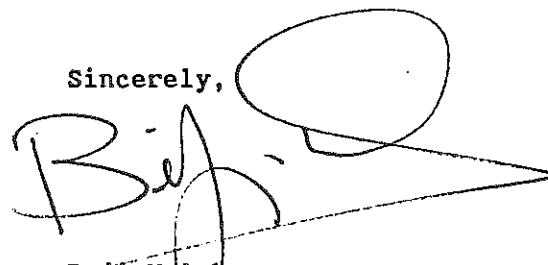
Copies of all manifests for disposal of the oily waste are also attached (Attachment IV). These have previously been submitted to the State at various times with our latest submittal to Ms. Sheryl Atkins, Indiana State Board of Health, on September 10, 1984.

Also as requested in your Notice of Violation (V-114) is the closure procedure and plan which was followed to dispose of the waste material tank (Attachment V).

It is Cities Service Oil Company's belief that it has acted in good faith and in compliance with applicable waste disposal regulation regarding the safe and secure disposal of the waste material that was being stored at its East Chicago, Indiana products terminal in 1982.

We trust that the above and submitted information satisfies the requirement of your Notice of Violation. However, do not hesitate to contact the undersigned if you have further questions or need more information. We would appreciate your cooperation by sending us a written dismissal of the subject NOV upon your review and evaluation of submitted information.

Sincerely,


Beji Malek
Environmental Coordinator

BM/get

Attachments

cc: John Grabowski - CITGO Petroleum Corp.
Ancal Neal - CITGO Petroleum Corp.

FILE: Legal/East Chicago

miko chapman

recycled paper

Chemical Waste
Management
Inc.

Chemical Waste Management of Illinois, Inc.

4300 W. 123rd Street
Alsip, Illinois 60658
312/396-1050

November 13, 1981

Mr. B. L. Reeder
Cities Service Pipeline Co.
2500 Chicago Avenue
East Chicago, Indiana 46312

Dear Mr. Reeder:

As we discussed in our previous conversations, Chemical Waste Management is pleased to present the following proposal for the cleaning, drumming, hauling and disposal of approximately 15,000 gallons of waste oil and sulfuric acid mixture contained in a single tank.

Our cost for the above mentioned services will be approximately \$35,000. with total costs not to exceed \$40,000..

All work will be handled in accordance with existing E.P.A. and D.O.T. regulations and disposed of at an E.P.A. approved hazardous waste landfill site.

We thank you for the opportunity to present this proposal and look forward to doing business in the future.

Sincerely,

Peter J. Marks

PETER MARKS
Technical Sales Representative

PM:nak

cc: Robert LaVahn
Area Sales Manager



Chemical Waste Management, Inc.

4300 West 123rd. Street
Alsip, Illinois 60658
312 396-1050

January 12, 1982

Cities Service, Inc.
2500 E. Chicago Avenue
East Chicago, Indiana 46320

Attn: B. L. Reeder

Re: Waste Transportation, Disposal and Cleaning of Tank #195

Dear Mr. Reeder:

The subject work has been completed with all material being disposed of in Chemical Waste Management owned and operated State and Federal approved chemically secure landfills.

All State and Federal E.P.A. regulations regarding transportation and disposal have been complied with as agreeded.

Sincerely,

ROBERT LAVAHN
AREA SALES MANAGER

RL:nak

Subscribed and sworn to before me this 12 day of

January 1982.

Sherrie Jordan
Notary Public

January 22, 1982

Cities Service Company
2500 E. Chicago Avenue
East Chicago, IN 46312

Attn: Mr. Bob Reeder

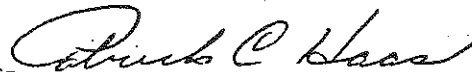
Re: Storage Tank #195 Inspection

Gentlemen:

In accordance with your request, we inspected the 15 ft. diameter by 15 ft. high steel tank which had formerly been lead lined. We found the tank to be empty and dry at the time of inspection. Enclosed is our application for payment.

Please contact this office if you have any questions regarding our inspection.

Very truly yours,



Patrick C. Haas, P.E.
Indiana P.E. License No. 7585

dn
Enclosure





HAZARDOUS WASTE MANIFEST

CWMA
31274

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR CITIES SERVICE CO.	2500 E. CHILDS AVE. EAST CHICAGO, IL 60631	312-0134	7111111111111111
TRANSPORTER NO. 1 CENTRAL WASTE MGMT. INC.	4300 W. 123 MILWAUKEE, WI 53218	414-234-5678	1111111111111111
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P.O. Box 55 Emelle, Alabama 35459	205-652-9531	A111000622464

WASTE INFORMATION

CONTAINER NO.	TYPE	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
5	DRUMS	Hazardous Waste Liquid NOS					2255
		Sludge Containing Solvents					

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 GENERATOR — () US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Signature of Generator: *[Signature]* Title: *[Title]* Date: *1/15/86*

This is to certify acceptance of the hazardous waste shipment described above:

Signature of Transporter #1: *[Signature]* Title: *[Title]* Date: *1/15/86*

Signature of Transporter #2: *[Signature]* Title: *[Title]* Date: *1/15/86*

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Signature of Disposer: *[Signature]* Title: *[Title]* Date: *1/15/86*

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	

PRODUCER NO. 1

ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

01310

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR Cities Service, Inc.	2500 E. Chicago Avenue East Chicago, Ind. 46312	(219) 396-0734	1 1 5 0 5 2 5 7 2 1
TRANSPORTER NO. 1 Chemical Waste Management, Inc.	4300 W. 123rd Street Alsip, Il. 60652	(312) 396-1050	1 6 0 0 0 0 2 1 2 0
TRANSPORTER NO. 2			1 1 1 1 1 1 1 1 1 1
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	A L T O O O 6 2 2 4 6

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	C W M A WASTE CODE	WEIGHT
NO.	TYPE						
60 79	24 DRUMS	Hazardous Waste Liquid N.O.S.			RD A54828	RVD A54828	3100 963
		(Waste Oil and Hydrochloric Acid Mixture)					100

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531; GENERATOR: 219 388-3744 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Generator

Title

Date _____

Transporter # 1

Title

Date _____

Transporter #2

Title

Data

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Disposer

- Title

Date _____

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	60	55	D81	14	n	1	41,780 lb

PRODUCER NO. 2



HAZARDOUS WASTE MANIFEST

CWMA

31311

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR Cities Service, Inc.	2500 E. Chicago Avenue East Chicago, Ind. 46312	(219) 398-0734	
TRANSPORTER NO. 1 Chemical Waste Management	4300 W. 123rd Street Alsip, IL. 60658	(312) 396-1050	
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	A/L/T/O/O/O/6/2/2/4/6/4

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	C W M A WASTE CODE	WEIGHT
NO.	TYPE						
600	DRUMS	Hazardous Waste Liquid NOS (Waste Oil and Hydrochloric Acid Mixture) Sulfuric	3000	GAL	D1 902 111 111 111 111 111	RVD A54828	39.06

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 ; GENERATOR — (219) 398-0734 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Cities Service Inc.
Generator

[Signature]
Title

12-4-81
Date

This is to certify acceptance of the hazardous waste shipment described above:

[Signature]
Transporter #1

[Signature]
Title

12-4-81
Date

[Signature]
Transporter #2

[Signature]
Title

12-4-81
Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

[Signature]
Disposer

[Signature]
Title

12-9-81
Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	600	35/drum	D81	14	18	1	41,080 lbs

PRODUCER NO. 2

#4



HAZARDOUS WASTE MANIFEST

CWMA

31312

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR			
Cities Service, Inc.	2500 E. Chicago Avenue East Chicago, Ind. 46312	(219) 393-0734	
TRANSPORTER NO. 1			
Chemical Waste Management	4300 W. 123rd Street Alsip, IL. 60658	(312) 396-1050	
TRANSPORTER NO. 2			
DISPOSER			
Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	AL T O O O 6 2 2 4 6

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	C W M A WASTE CODE	WEIGHT
NO.	TYPE						
34	DRUMS	Hazardous Waste Liquid N.O.S. ^{UN#} 1832	1870	Gal.		RVD A 54828	22.13
		Waste Oil and Hydrochloric Acid Mixture					
		Sulfuric ID					

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531; GENERATOR — (219) 393-0734 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Cities Service Co. Generator James J. Jager Title 12/1/11 Date

This is to certify acceptance of the hazardous waste shipment described above:

Paul H. Transporter #1 Paul H. Title 12/1/11 Date

Paul H. Transporter #2 Paul H. Title 12/1/11 Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Paul H. Disposer Paul H. Title 12/1/11 Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	34	SS	12-21	14	19	1	

PRODUCER NO. 2

714

HAZARDOUS WASTE MANIFEST

Recycled paper

34052

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR A. TIES SERVICE	2500 EAST CHICAGO AVE EAST CHICAGO, IN 46312	(219) 398-0734	11111111-11111111
TRANSPORTER NO. 1	4300 W. 1231ST A. HENRIK HINSE & NORT	(317) 396-1051	11111111-11111111
TRANSPORTER NO. 2			11111111-11111111
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	A111000622464

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.		C W M A WASTE CODE	WEIGHT
NO.	TYPE							
1	LAND	HAZARDOUS WASTE SOLIDS - ALK	20	KG	III	III	KU D A54228	3310
		ORM - E			III	III		
					III	III		

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 ; GENERATOR — (219) 395-0734 US COAST GUARD 1-800-424-8802
SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Generator	Titles	Date
00-33349-P	00-33349-P	1-1-82

This is to certify acceptance of the hazardous waste shipment described above:

<u>Transporter #1</u>	<u>DRIVER</u>	<u>1/15/10</u>
Title	Title	Date
<u>Transporter #2</u>	<u></u>	<u></u>
Title	Title	Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

<u>William H. ...</u>	<u>...</u>	<u>1-17-87</u>
Disposer	Title	Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	1	N/A	T45-N84	14"	Sn. 7		34860 lbs
							Washed Dr. Tray 20 min

PRODUCER NO. 2



ALABAMA

CWMA

HAZARDOUS WASTE MANIFEST

dated per 10/23

34053

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR Cities Service	2500 E. OREGON AVE EAST CHICAGO, IL 60312	(714) 378-0734	11111111111111
TRANSPORTER NO. 1 Chemical Waste Mgmt	4300 W. 123RD ST ALSIP, IL 60559	(815) 291-1650	11111111111111
TRANSPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	A L T O O O 6 2 2 4 6 4

WASTE INFORMATION

CONTAINER		DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.		C W M A WASTE CODE	WEIGHT
NO.	TYPE							
1	DRUM	HAZARDOUS WASTE SOLID - MMS	18	MMS	111	111	K O P A C H O O P	25000
		DRUM - E			111	111		
					111	111		

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531; GENERATOR — (714) 378-0734 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Generator Title Date

This is to certify acceptance of the hazardous waste shipment described above:

Transporter #1 Title Date

Transporter #2 Title Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Disposer Title Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	1	Drum	D81	14	23		33180 lbs
							20 90 yds

PRODUCER NO. 2

LH 2 X 10 MIN @ WMA BACK

CLOSURE PLAN
Tank No. 195
East Chicago Terminal
EPA ID No. IND095267381

Background

Tank No. 195 was a 15 feet diameter by 15 foot height steel tank containing approximately 15,000 gallons of oily waste.

At the time of final disposal of the material, the following procedures were followed in our plan of closure.

1. All waste materials were removed and placed in sealed drums.
2. Tank was cleaned with pressurized steam and liquids generated from the cleanup operations were placed in drums for disposal. This same procedure was applied to connected piping and appurtenances.
3. All personnel involved in the disposal and cleaning operation were equipped with appropriate and approved clothing, gloves and air breathing apparatus.
4. Tank was tested for hydrocarbon vapors to assure that all waste had been removed and tank cleaning was completed satisfactorily.
5. All drums containing waste material were sealed, marked and labeled in accordance with DOT regulation 49CFR Part 172.
6. Shipping manifests were prepared in accordance with Parts 265.70 - 265.77, Subpart E - Manifest System, Recordkeeping and Reporting.
7. Drums containing the waste and cleaning material were transported by approved and licensed waste hauler to Chemical Waste Management facility in Emelle, Alabama.

8. After the tank was steam cleaned, it was allowed to dry and was inspected by Haas Associates Consulting Engineers to verify completion of cleanup operation.
9. After tank had been inspected and cleaning approved, it was dismantled and sold for scrap by National Wrecking Company to the Scrap Corporation of America.
10. After all operations had been completed and tank removed, the surrounding area was inspected to ensure spillage had not occurred or any material was remaining on the ground surface. The surrounding area was clean and no further cleanup action was necessary.
11. Since waste material was stored in a closed and secure steel tank, post-closure requirements did not apply.
12. Prior to all operation, applicable federal regulations were reviewed to determine and insure compliance. These regulations included:

40 CFR

Part 262 - Standards applicable to generators of hazardous waste Sections

- 262.11 for determining whether or not he has a hazardous waste
- 262.12 for obtaining an EPA identification number
- 262.34 for accumulation of hazardous waste
- 262.40 (c) and (d) for record keeping
- 262.43 for additional reporting
- 262.34 Accumulation time
- 262.34(b) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to requirements of 40CFR Parts 264 and 265 unless he has been granted an extension

Part 263 - Standards applicable to transporters of hazardous waste.

Part 265 - Interim status Standards for owners and operators of hazardous waste treatment, storage and disposal facilities.

Subpart J- Tanks

BM:get

07/11/85

g/3868

CLOSURE PLAN
Tank No. 195
East Chicago Terminal
EPA ID No. IND095267381

Background

Tank No. 195 was a 15 feet diameter by 15 foot height steel tank containing approximately 15,000 gallons of oily waste.

At the time of final disposal of the material, the following procedures were followed in our plan of closure.

1. All waste materials were removed and placed in sealed drums.
2. Tank was cleaned with pressurized steam and liquids generated from the cleanup operations were placed in drums for disposal. This same procedure was applied to connected piping and appurtenances.
3. All personnel involved in the disposal and cleaning operation were equipped with appropriate and approved clothing, gloves and air breathing apparatus.
4. Tank was tested for hydrocarbon vapors to assure that all waste had been removed and tank cleaning was completed satisfactorily.
5. All drums containing waste material were sealed, marked and labeled in accordance with DOT regulation 49CFR Part 172.
6. Shipping manifests were prepared in accordance with Parts 265.70 - 265.77, Subpart E - Manifest System, Recordkeeping and Reporting.
7. Drums containing the waste and cleaning material were transported by approved and licensed waste hauler to Chemical Waste Management facility in Emelle, Alabama.

8. After the tank was steam cleaned, it was allowed to dry and was inspected by Haas Associates Consulting Engineers to verify completion of cleanup operation.
9. After tank had been inspected and cleaning approved, it was dismantled and sold for scrap by National Wrecking Company to the Scrap Corporation of America.
10. After all operations had been completed and tank removed, the surrounding area was inspected to ensure spillage had not occurred or any material was remaining on the ground surface. The surrounding area was clean and no further cleanup action was necessary.
11. Since waste material was stored in a closed and secure steel tank, post-closure requirements did not apply.
12. Prior to all operation, applicable federal regulations were reviewed to determine and insure compliance. These regulations included:

40 CFR

Part 262 - Standards applicable to generators of hazardous waste Sections

- 262.11 for determining whether or not he has a hazardous waste
- 262.12 for obtaining an EPA identification number
- 262.34 for accumulation of hazardous waste
- 262.40 (c) and (d) for record keeping
- 262.43 for additional reporting
- 262.34 Accumulation time
- 262.34(b) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to requirements of 40CFR Parts 264 and 265 unless he has been granted an extension

Part 263 - Standards applicable to transporters of hazardous waste.

Part 265 - Interim status Standards for owners and operators of hazardous waste treatment, storage and disposal facilities.

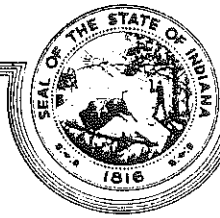
Subpart J- Tanks

BM:get

07/11/85

g/3868

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

September 18, 1985

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

Times
417 Fayette Street
P. O. Box 448
Hammond, IN 46325

SEP 19 11 30 AM '85
DIVISION OF HEALTH
P.O. BOX 1964
INDIANAPOLIS, IN 46206-1964
BOARD OF HEALTH

Gentlemen:

Re: Cities Service Company/
Citgo Petroleum Corporation

Please insert for one time only, September 25, 1985, the enclosed public notice.

As we understand it, you will provide us with a notarized form and clippings showing the date on which the advertisement appeared in your paper. Please forward these to the attention of the Division of Budget and Requirements at the above address.

Thank you for your cooperation.

Sincerely,

Arthur L. Logsdon

Arthur L. Logsdon, Director
Office of Agency Communications
317/633-0109

Enclosure

cc: Ms. Sheryl Atkins

PUBLIC NOTICE

The Technical Secretary of the Indiana Environmental Management Board has received a closure plan from Cities Service Company/Citgo Petroleum Corporation, 2500 East Chicago Avenue, East Chicago, Indiana 46312. The Company originally notified the U.S. Environmental Protection Agency as a storer of hazardous waste with the following hazardous waste activities: storage in tanks. The plan proposes the elimination of the following hazardous waste activities: storage in tanks.

Pursuant to 40 CFR 265, Subpart G, and 320 IAC 4-7-1, the Technical Secretary is providing the owner or operator and the public an opportunity to submit written comments on the plan and request modifications of the plan within thirty (30) days of date of this notice. Corrective action response letters will be sent to the facility to elicit information to ensure that there have been no uncorrected releases concerning hazardous wastes or hazardous waste constituents to the environment from any existing or former solid waste management units. This is to fulfill the U.S. EPA's obligation under the Hazardous and Solid Waste Amendments of November 8, 1984.

The Technical Secretary can also, in response to a request, hold a public hearing whenever such a hearing might clarify one or more issues concerning the plan or issues involving releases of hazardous waste or hazardous waste constituents from the facility. The Technical Secretary will give public notice of the hearing at least thirty (30) days before it occurs.

The plan and related background documents are available for inspection and copying by the public at the Indiana State Board of Health, Division of Land Pollution Control, 5500 West Bradbury Avenue, Indianapolis, Indiana, from 8:15 a.m. to 4:45 p.m., Monday through Friday. The plan is also available at the East Chicago City Health Department, 3901 Indianapolis Boulevard, East Chicago, Indiana.

Persons wishing to comment on the plan should submit such comments in writing to:

Mr. Ralph C. Pickard
Technical Secretary
Indiana Environmental Management Board
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

For additional information, contact Ms. Sheryl Atkins at AC 317/243-5091.

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: September 26, 1985

THRU: Jack C. Corpuz
Terry F. Gray

11766 3
JC 9/26/85
TFG 9/26/85

TO: Sheryl K. Atkins
Plan Review and Permit Section

FROM: Jami L. Thais *JL Thais*
Chemical Evaluation Section

SUBJECT: Review of Closure Plan for
Cities Service Company/CITGO Petroleum Corporation
East Chicago, Indiana
IND 095267381

I have reviewed the closure plan for Cities Service Company, East Chicago, Indiana, as requested. Due to the nature of this review, there are not many technical comments which can be made. The tank storage has already been closed and the tank dismantled and disposed of. The only question and comment which I have is:

In the cover letter, dated July 17, 1985, the closure schedule and date of closure are included. Do these dates also have to be included in the actual closure plan? If so, this should be done.

If any additional information is needed, please contact me at extension 5071.

JLT/sk

TECHNICAL REVIEW SHEET
Part B Applications and
Closure/Post-Closure Plans

Name of Facility Citgo Service Co. / Citgo Petroleum Corp.

EPA I.D. Number WD 095267381

Location of Facility East Chicago

Type of Closure ☐ Part B ☒ Interim Status ☐ Other

CHEL Initial Evaluation Date: 7/25/84

Instructions

Below is a checklist for the review of this plan. Please provide your initials and dates of review in this area. Comments should be typewritten and attached to the sheet. After your Section's review, please return to Meryl Atkins of the Plan Review and Permit Section. A response is due by: 9/3/85.

<u>Section</u> (Check One)	<u>Initials</u>	<u>Begin Date</u>	<u>End Date</u>	<u>Returned To</u> <u>Plan Reviewer</u>
<input type="checkbox"/> Engineer	_____	_____	_____	_____
<input checked="" type="checkbox"/> Chemist	<u>SLT</u>	<u>9/25/85</u>	<u>9/26/85</u>	<u>9/26/85</u>
<input type="checkbox"/> Geologist	_____	_____	_____	_____
<input type="checkbox"/> Attorney	_____	_____	_____	_____

Comments _____

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

TO: Robert Malone
Enforcement Section

DATE: October 1, 1985

THRU: James Mattes ^{8am}
Thomas Russell

FROM: Sheryl Atkins ^{SKA}
Plan Review and Permit Section

SUBJECT: Closure Plan
Cities Service Company/Citgo Petroleum Corporation
East Chicago, Illinois
IND 095267381

I have reviewed the closure plan for the above-referenced facility and have noted the following deficiencies the company should address:

1. General facility information and a description of the manufacturing processes that generated the waste oil and sulfuric acid (40 CFR 265, Subpart G, and 320 IAC 4-7-1).
2. How facility closure met the closure performance standard (40 CFR 265.111 and 320 IAC 4-7-1). (They can simply repeat the wording used in the regulations if desired.)
3. Describe the maximum extent of operation remaining unclosed following closure, including the maximum inventory of wastes (40 CFR 265.112 and 320 IAC 4-7-1). (If they did not transport, generate, treat, store, or dispose of any hazardous waste at this site following closure, they should state this. If they still conduct other hazardous waste activities at this site following closure, they should describe in detail.)
4. The "Attachment V Closure Plan" document should be amended to include the dates of waste removal and disposal, and of tank cleaning, dismantling, and removal. These dates are mentioned in the cover letter dated July 17, 1985, and in other supporting documentation submitted with Attachment V.

SKA/tr

STATE BOARD OF HEALTH

INDIANAPOLIS

ICIB
LAKEOFFICE MEMORANDUM

DATE: October 1, 1985

TO: Robert Malone
Enforcement SectionTHRU: James Mattes ^{8m}
Thomas Russell ^{TR 10/7}FROM: Sheryl Atkins ^{SKA}
Plan Review and Permit SectionSUBJECT: Closure Plan
Cities Service Company/Citgo Petroleum Corporation
East Chicago, Illinois
IND 095267381

I have reviewed the closure plan for the above-referenced facility and have noted the following deficiencies the company should address:

1. General facility information and a description of the manufacturing processes that generated the waste oil and sulfuric acid (40 CFR 265, Subpart G, and 320 IAC 4-7-1).
2. How facility closure met the closure performance standard (40 CFR 265.111 and 320 IAC 4-7-1). (They can simply repeat the wording used in the regulations if desired.)
3. Describe the maximum extent of operation remaining unclosed following closure, including the maximum inventory of wastes (40 CFR 265.112 and 320 IAC 4-7-1). (If they did not transport, generate, treat, store, or dispose of any hazardous waste at this site following closure, they should state this. If they still conduct other hazardous waste activities at this site following closure, they should describe in detail.)
4. The "Attachment V Closure Plan" document should be amended to include the dates of waste removal and disposal, and of tank cleaning, dismantling, and removal. These dates are mentioned in the cover letter dated July 17, 1985, and in other supporting documentation submitted with Attachment V.

SKA/tr



recycled paper

IC16
hake

CITGO Petroleum Corporation

RECEIVED

SEP 26 1985

Box 3758
Tulsa, Oklahoma 74103

September 24, 1985

OCT 2 10 36 AM '85
DIVISION OF LAND
POLLUTION CONTROL
STATE HEALTH
BOARD

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SW-3 - A
U.S. EPA, REGION V

RECEIVED

SEP 26 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

Ms. Edith M. Ardiente, P. E.
Chief, Technical Programs Section
U. S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: Citgo Petroleum Corporation
East Chicago, Indiana
EPA I. D. No. IND 095267381 C.T.S.D.P.A. 8

Dear Ms. Ardiente:

This letter is to acknowledge receipt on September 6, 1985, of your correspondence dated September 3, 1985, concerning the corrective action requirements of the Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendments of 1984 as they relate to the Citgo Petroleum Corporation ("Citgo") bulk petroleum products terminal located at 2500 East Chicago Avenue, East Chicago, Indiana.

As you may be aware, this terminal was owned and operated by Cities Service Company ("Cities"). In November, 1980, Cities determined that it would not be reasonably feasible to remove certain waste material scheduled for disposal within the allotted 90 days (see 40 CFR 262.34). Accordingly, to avoid non-compliance, on November 18, 1980, Cities submitted an application to the U. S. Environmental Protection Agency ("EPA") to operate a hazardous waste storage facility. In a letter dated June 24, 1982, addressed to EPA, Cities requested closure of this storage facility. In this letter, Cities noted that the operation would remain a generator of hazardous waste. Further, in a letter dated March 18, 1983, forwarding a copy of the 1982 annual report to the Indiana State Board of Health ("ISBH"), Cities again noted that a request for closure was submitted to EPA, Region V.

On May 16, 1983, Citgo and Cities submitted correspondence jointly addressed to EPA and ISBH requesting the referenced hazardous waste generator identification number be transferred from Cities to Citgo effective May 30, 1983. Pursuant to a verbal request from EPA on November 17, 1983, Citgo submitted a Notification of Hazardous Waste Activity form to reflect that Citgo is only a generator of hazardous waste at the East Chicago terminal.

On April 8, 1985, Citgo and Cities met with representatives of Ecology and Environment and ISBH to review hazardous waste activities at the East Chicago site. As you are aware, Ecology and Environment is a consultant to

Ms. Ardiente
September 24, 1985
Page 2.


EPA. Both parties, I understand, were satisfied at the conclusion of the meeting that the terminal was not involved in any on-site hazardous waste treatment, storage or disposal activities.

In a Notice of Violation dated June 11, 1985, ISBH requested additional information concerning closure of this hazardous waste storage facility. This information was provided to ISBH in a letter from Cities dated July 17, 1985. A copy of this record review summary prepared by Cities is enclosed for your records.

In light of this information, it appears EPA's request to Citgo to complete a Certification Regarding Potential Releases from Solid Waste Management Units is not appropriate as closure was sought by Cities, the former operator of the terminal, prior to the November 8, 1984 enactment of the Hazardous and Solid Waste Amendments of 1984 and, as stated previously, Citgo is not seeking a permit to treat, store, or dispose of hazardous waste at this site under Section 3005 of RCRA. Therefore, Citgo is returning this form to you uncompleted. Further, as closure was thought to be completed by Cities prior to Citgo's involvement with the terminal, please direct any further questions to that firm.

Should you have any questions concerning this matter, please contact me at 918/495-4764 at your convenience.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:rsk
Enclosure
cc: Ancal Neal
Jim Miller
Kirk Sniff, Dallas
Ken Robb, East Chicago
Beji Malek, CSOGC



CITIES SERVICE OIL AND GAS CORPORATION
P.O. BOX 300
TULSA, OKLAHOMA 74102

July 17, 1985

Mr. David D. Lamm, Director
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

Re: RCRA Closure Record Review
Cities Service Company
CITGO Petroleum Corporation
IND 095267381
Notice of Violation (V-114)

Dear Mr. Lamm:

This is in response to the above referenced Notice of Violation dated June 11, 1985. Pursuant to telephone conversation with Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, the response deadline was extended to July 19, 1985.

In 1980 when RCRA regulations became effective, as a result of past operations approximately 15,000 gallons of oily waste material being scheduled for disposal was stored in a 15 feet diameter x 15 feet high steel tank (Tank No. 195) at Cities Service Company Petroleum product terminal located in East Chicago, Indiana. It was Cities Service Company's (Company) belief that necessary arrangements and paperwork for the proper disposal of this waste material would extend beyond 90 days and therefore provisions of 40CFR 262.34(b) applicable to generators might be violated. To avoid such non-compliance, on November 18, 1980 Cities Service applied for a storage permit in lieu of requesting EPA for a time extension to dispose of the waste material. Further, the Company believed that full compliance with RCRA was being achieved by following the applicable sections in parts 262, 263 and 265 subpart (J)-tanks.

Our plan to dispose of the waste material was to secure an approved waste disposal contractor to remove the waste from the tank, place it in drums, clean the tank, haul and dispose of waste material at an approved disposal site and then remove the cleaned tank from the facility. On November 13, 1981 Chemical Waste Management Inc. (CWM) (4300 West 123rd Street, Alsip, Illinois 60658) was contracted by Cities Service to perform this work. Enclosed are CWM's proposal to perform the work and Cities Service Agreement with contractor (Attachment I). The waste removal, disposal and tank cleaning was completed in January 1982 (Attachment II CWM letter dated January 12, 1982). As required by regulations, an independent registered engineer Haas

July 17, 1985

recycled paper

and Associates was retained to inspect the emptied tank. Their inspection verified that the tank was satisfactorily cleaned and dried. (Attachment III is their report letter dated January 22, 1982). The cleaned tank and its appurtenances were dismantled and removed from the site as scrap metal by National Wrecking Company in the summer of 1983 as part of its contract with Cities Service to complete demolition and cleanup work at the Cities Service idle East Chicago Refinery site. Attachment IV is a copy of the executed agreement between Cities Service and National Wrecking and includes Exhibit A Scope of the work, which specifies removal of the cleaned tank in paragraph (2)(c). The tank scrap metal was sold by National Wrecking to Scrap Corporation of America in Chicago, Illinois.

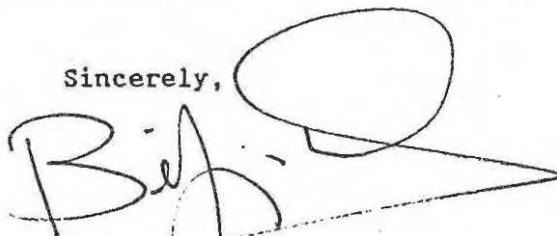
Copies of all manifests for disposal of the oily waste are also attached (Attachment IV). These have previously been submitted to the State at various times with our latest submittal to Ms. Sheryl Atkins, Indiana State Board of Health, on September 10, 1984.

Also as requested in your Notice of Violation (V-114) is the closure procedure and plan which was followed to dispose of the waste material tank (Attachment V).

It is Cities Service Oil Company's belief that it has acted in good faith and in compliance with applicable waste disposal regulation regarding the safe and secure disposal of the waste material that was being stored at its East Chicago, Indiana products terminal in 1982.

We trust that the above and submitted information satisfies the requirement of your Notice of Violation. However, do not hesitate to contact the undersigned if you have further questions or need more information. We would appreciate your cooperation by sending us a written dismissal of the subject NOV upon your review and evaluation of submitted information.

Sincerely,



Beji Malek
Environmental Coordinator

BM/get

Attachments

cc: John Grabowski - CITGO Petroleum Corp.
Ancal Neal - CITGO Petroleum Corp.

FILE: Legal/East Chicago



CITIES SERVICE OIL AND GAS CORPORATION
P.O. BOX 300 TULSA, OKLAHOMA 74102

November 27, 1985

CERTIFIED MAIL

Mr. Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Division of Land Pollution Control
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 56206-1964

RE: Closure Plan - NOV (V-114)
Cities Service Company
CITGO Petroleum Corporation
East Chicago, Indiana
IND 095267381

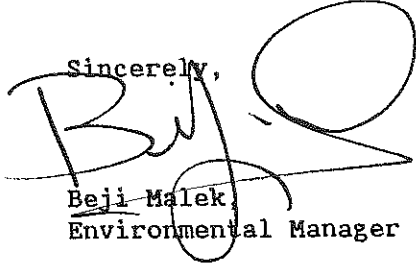
Dec 2 11 18 AM '85
DIVISION OF LAND
POLLUTION CONTROL
STATE
BOARD OF HEALTH

Dear Mr. Russell:

In response to your letter dated October 22, 1985 regarding referenced subject, attached are the requested closure plan amendments.

We trust that these amendments and other supporting documents submitted to the Indiana State Board of Health on September 10, 1984 and July 17, 1985 are sufficient to satisfactorily resolve and close the Notice of Violation (V-114). We would appreciate your cooperation by sending us a written notice closing the subject NOV upon your review and evaluation of additional information transmitted herein.

Sincerely,


Beji Malek
Environmental Manager

BM:get
Attachments
cc & att:

Mr. John Grabowski
CITGO Petroleum Corporation

Robert R. Reis, Esq.
Cities Service Oil and Gas Corporation

Mr. Herman A. Fritschen
Cities Service Oil and Gas Corporation

F: L/East Chicago

CLOSURE PLAN AMENDMENTSITEM 1

Cities Service Company operated a refinery complex at the East Chicago site until late 1972. After the refinery was shut down in 1972, a dismantling and cleanup program was undertaken and completed in 1983. Currently there are no manufacturing processes on site.

The oily and sulfuric acid mixture was a waste by-product from a 1968 pilot project apparently designed to reduce the sulfur concentration in some crude oils. Apparently, the Sulfuric Acid Recovery Process (SARP) was abandoned due to inefficiency and high maintenance costs. Attached schematic diagram "Figure 1" shows this process.

ITEM 2

It is believed that full compliance has been achieved with the requirements of 40 CFR Part 265.111 and 320 IAC 4.1-21-2. 40 CFR Part 265.111 requires that "the owner or operator must close his facility in a manner that: (a) minimizes the need for further maintenance and (b) controls, minimizes or eliminates to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rain fall, or waste decomposition products to the ground or surface waters or to the atmosphere." Based on a telephone conversation with Mr. Robert Malone on November 7, 1985, Indiana State regulations 320 IAC 4.1-21-2 requirements are the same as 40 CFR 265.111.

The above requirement, 265.111(a) was met by completely cleaning, removing and scrapping the tank. There is no waste storage or disposal facility on the site which require further maintenance. Requirement, 265.111(b), in our opinion, is not applicable to this particular closure since all waste material was transported and properly disposed of at an approved off-site commercial disposal site. No waste or residue exists at the site requiring post-closure care.

ITEM 3

As mentioned above in Item 1, all manufacturing processes have been long ceased at this site and there are no hazardous waste activities including storage, disposal or treatment at this site. However, CITGO Petroleum Corporation (CITGO) operates a petroleum product terminal at the site and is a generator of hazardous waste which is only generated during periodic cleaning of their petroleum product storage tanks. This generated waste during tank cleanup is not stored for any period of time on the site, but is directly removed by vacuum trucks during the tank cleaning operation and hauled off-site to an approved recycling or commercial disposal site. CITGO is excluded from hazardous waste storage regulations under the 40 CFR 261.4(c). Exclusions: "A hazardous waste which is generated in a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste-treatment manufacturing unit is not subject to regulation under Parts 262 through 265, 270, 271 and 124 of this chapter or to the notification requirements of Section 3010 of RCRA until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing or for storage or transportation of product or raw materials."

Cities Service Oil and Gas Corporation no longer owns the site nor does it own or operate any facilities on the site. This site and all facilities were transferred to CITGO on August 31, 1983. Your questions concerning current hazardous waste activities should be directed to CITGO.

ITEM 4

As requested "Attachment V Closure Plan", has been amended to include date of tank cleaning (Item 2), waste removal and disposal (Item 7), tank cleaning (Item 8) and tank dismantling and removal (Item 9). Amended "Attachment V" is enclosed and revisions are underlined for easy reference.

BM:get
11/27/85
g/469

ATTACHMENT V

Revised: November 27, 1985

CLOSURE PLAN
Tank No. 195
East Chicago Terminal
EPA ID No. IND095267381

Background

Tank No. 195 was a 15 feet diameter by 15 feet height steel tank containing approximately 15,000 gallons of oily waste.

At the time of final disposal of the material, the following procedures were followed in our plan of closure.

1. All waste materials were removed and placed in sealed drums.
2. Tank was cleaned with pressurized steam and liquids generated from the cleanup operations were placed in drums for disposal. This same procedure was applied to connected piping and appurtenances. The work was completed in January 1982.
3. All personnel involved in the disposal and cleaning operation were equipped with appropriate and approved clothing, gloves and air breathing apparatus.
4. Tank was tested for hydrocarbon vapors to assure that all waste had been removed and tank cleaning was completed satisfactorily.
5. All drums containing waste material were sealed, marked and labeled in accordance with DOT regulation 49 CFR Part 172.
6. Shipping manifests were prepared in accordance with Parts 265.70 - 265.77, Subpart E - Manifest System, Recordkeeping and Reporting.
7. Drums containing the waste and cleaning material were transported by approved and licensed waste hauler to Chemical Waste Management facility in Emelle, Alabama. The removal and disposal work was performed during the period April 1981 through January 1982.

8. After tank was steam cleaned, it was allowed to dry and was inspected by Haas Associates Consulting Engineers to verify completion of cleanup operation. A certification dated January 22, 1982 was received from Haas Associates verifying project completion.
9. After tank had been inspected and cleaning approved, it was dismantled and sold for scrap by National Wrecking Company to the Scrap Corporation of America in summer of 1983.
10. After all operations had been completed and tank removed, the surrounding area was inspected to ensure spillage had not occurred or any material was remaining on the ground surface. The surrounding area was clean and no further cleanup action was necessary.
11. Since waste material was stored in a closed and secure steel tank, post-closure requirements did not apply.
12. Prior to all operations, applicable federal regulations were reviewed to determine and ensure compliance. These regulations included:

40 CFR

Part 262 - Standards applicable to generators of hazardous waste

Sections

- | | |
|-----------|---|
| 262.11 | for determining whether or not he has a hazardous waste |
| 262.12 | for obtaining an EPA identification number |
| 262.34 | for accumulation of hazardous waste |
| 262.40 | (c) and (d) for recordkeeping |
| 262.43 | for additional reporting |
| 262.34 | accumulation time |
| 262.34(b) | A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to requirements of 40 CFR Parts 264 and 265 unless he has been granted an extension |

Parts

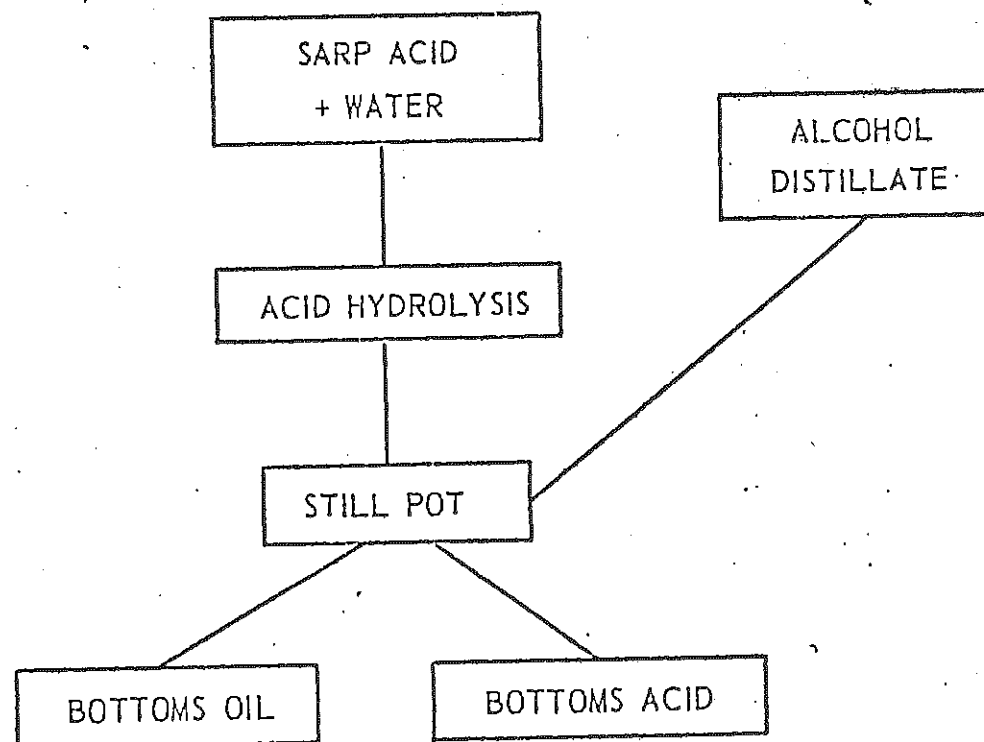
- 263 standards applicable to transporters of hazardous waste
265 interim status standards for owners and operators of hazardous waste treatment, storage and disposal facilities

Subpart J Tanks

BM:get

11/26/85

g/470

Figure 1ACID HYDROLYTIC DISTILLATIONSAMPLETREATMENT

W. J. ... *Cities Service* *Lake*
ATTACHMENT TO STATE'S GENERATOR BIENNIAL
HAZARDOUS WASTE REPORT FOR 1985

This report is for the calendar year ending December 31, 1985.

The Hazardous and Solid Waste Amendments of 1984 require all generators of hazardous waste to submit the following information to the United States Environmental Protection Agency or a State authorized to collect such information:

Generator's EPA I.D. No. I N D 0 9 5 2 6 7 3 8 1

Waste Minimization

Describe in the space below your efforts, undertaken during calendar year 1985, to reduce the volume and toxicity of the hazardous waste which your business generates. Also describe changes in waste volume and toxicity actually achieved during 1985 in comparison to previous years, to the extent possible.

With the exception of the removal of a transformer with a weight of 4.12 tons, no hazardous wastes were generated at this location during calendar year 1985.

Therefore, the company has minimized hazardous wastes to the minimum practicable amount during calendar year 1985.

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

John S. Grabowski, Jr.
Print/Type Name

Environmental Mgr.
Title

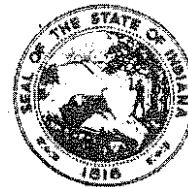
[Signature]
Signature

March 20, 1986
Date Signed

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND035267381
CITIES SERVICE COMPANY
PO BOX 178
EAST CHICAGO, IN

46312



FORM E:

Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 1985

FORM G:
GENERATOR BIENNIAL REPORT

☒

FORM F:
FACILITY BIENNIAL REPORT

☐

DID NOT GENERATE/TSD HAZARDOUS

☐

SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE
GENERATE LESS THAN 100 Kg PER MONTH ☐ GENERATE BETWEEN 100 & 1000 Kg PER MONTH ☐

II. INSTALLATION'S EPA I.D. NUMBER

IND0195267381

III. NAME OF INSTALLATION

CITGO PETROLEUM CORPORATION

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box

P.O. Box 178

City or Town

EAST CHICAGO

State

IN

Zip Code

46312

V. LOCATION OF INSTALLATION

Street or P. O. Box

2500 EAST CHICAGO AVENUE

City or Town

EAST CHICAGO

State

IN

Zip Code

46312

County

DAKE

VI. INSTALLATION CONTACT

Last Name

First Name

Phone (area code & no.)

ROBB

KEN

219/398-0734

VII. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

John S. Grabowski, Jr.
(A.) PRINT OR TYPE NAME AND TITLE

(B.) SIGNATURE

February 25, 1986
(C.) DATE SIGNED

Please print or type with ELITE type (12 characters per inch).

PAGE 1 OF 2



FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 85

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER I | N | D | 0 | 9 | 5 | 2 | 6 | 7 | 3 | 8 | 1

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G. List the EPA Identification Numbers and Names for all transporters whose services were used during the year.

A - 1 Disposal

MID05965452

X. FACILITY'S NAME (specify) FACILITY'S EPA ID NUMBER

E | N | S | C | O | I | N | D | A | R | D | 0 | 6 | 9 | 7 | 4 | 8 | 1 | 9 | 2

XI. FACILITY'S ADDRESS

Street or P. O. Box A | M | E | R | I | C | A | N | R | O | A | D

City or Town E | L | D | R | A | D | O State A | R Zip

XII. WASTE IDENTIFICATION

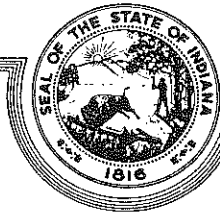
L I N E N U M B E R	(A.) DESCRIPTION OF WASTE (limit to 45 characters)	(B.) DOT HA- ZARD CLASS	(C.) EPA HAZARDOUS WASTE (see codes)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Waste Polychlorinated Biphenyls		P C B	4.12	P * * * * (T) * * * *
2					P * * * * T * * * *
3					P * * * * T * * * *
4					P * * * * T * * * *
5					P * * * * T * * * *
6					P * * * * T * * * *
7					P * * * * T * * * *
8					P * * * * T * * * *

XIII. COMMENTS (enter information by line number -- see instructions)

File

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



1 C/K Lake

INDIANAPOLIS 46206-1964

1330 West Michigan Street
P. O. Box 1964

March 5, 1986

VIA CERTIFIED MAIL

Ms. Beji Milek
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

Dear Ms. Milek:

Re: Cities Service Company/
Citigo Petroleum Corporation
East Chicago, Indiana
IND 095267381

Pursuant to 40 CFR 265.112 and 320 IAC 4.1-21-3(d), the Technical Secretary of the Indiana Environmental Management Board has approved the closure plan submitted by Cities Services Company/Citigo Petroleum Corporation on June 17, 1985.

The facility originally notified the U.S. Environmental Protection Agency as a storer of hazardous waste with the following hazardous waste activity: S02 (tank storage). The approved plan calls for the elimination (closure) of tank storage.

The plan was reviewed by staff of the Division of Land Pollution Control, Indiana State Board of Health. The public comment period began on September 25, 1985, and ended on October 25, 1985. No comments were received.

Closure activities must be completed in accordance with the approved plan within one hundred eighty (180) days after the date of this approval letter. When closure is completed, the owner or operator must submit to the Technical Secretary certification per 40 CFR 270.11(d) and 320 IAC 4.1-21-6 both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved plan. The response

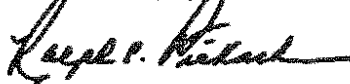
must indicate the desired future status of the facility (treatment/storage/disposal facility, generator, small quantity generator, or non-handler). Mail your response and certification to:

Mr. Ralph C. Pickard
Technical Secretary
Indiana Environmental Management Board
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) requires that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. The U.S. Environmental Protection Agency (EPA) has the authority to implement this provision, therefore, a facility may still be subject to HSWA requirements.

Please direct all questions regarding the closure process to Mr. Garry Mills, Division of Land Pollution Control, AC 317/243-5145.

Very truly yours,



Ralph C. Pickard
Technical Secretary

GLM/kp

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Pat Vogtman, U.S. EPA, Region V
East Chicago City Health Department



JUN 9 11 55 AM '86

DIVISION OF LAND
POLLUTION CONTROL
STATE
BOARD OF HEALTH

CITIES SERVICE OIL AND GAS CORPORATION
P.O. BOX 300
TULSA, OKLAHOMA 74102

*Take County
Cities Serv. Co. / Citigo
Petroleum Corp.*

I L I L

June 4, 1986

Mr. Garry Mills
Indiana Department of Environmental Management
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

Re: Cities Service Company/
CITGO Petroleum Corporation
East Chicago, Indiana
IND 09526781

Dear Mr. Mills:

Please be advised that closure of Tank No. 195 at the reference site has been completed pursuant to the approved closure plan. Attached is a joint certification by Haas and Associate Consulting Engineers and our company confirming facility closure in accordance with the specifications in the approved plan.

I trust that the attached certification fulfills your requirement for closing the pending Notice of Violation (V-114) dated June 11, 1985, and we would appreciate receiving a written confirmation regarding dismissal of this NOV. Please call if you need further information.

Sincerely,


Beji Malek
Environmental Manager

BM/get

Attachment

cc & att: T.L. Byers
Herman A. Fritschen
Cities Service Oil and Gas Corporation
Tulsa, OK

Mr. John Grabowski
CITGO Petroleum Corporation
Tulsa, OK

Mr. Ralph C. Pickard
Indiana Department of Environmental Management
Indianapolis, IN



*Take
Cities Serv. Co./Co
Petroleum Corp*

CITIES SERVICE OIL AND GAS CORPORATION
P.O. BOX 300 TULSA, OKLAHOMA 74102

April 7, 1986

ICIL

Indiana Department of Environmental Management
1330 West Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206-1964

Attention Mr. Garry Mills

Re: Cities Service Company/Citgo Petroleum
Corporation - East Chicago, Indiana
IND 095267381

Dear Mr. Mills:

This is in response to Mr. Ralph C. Pickard's letter dated March 5, 1986 regarding the referenced site. Pursuant to your telephone conversation with Thomas L. Byers on April 2, 1986 we are responding to your attention.


The undersigned certify under penalty of law that the storage tank No. 195, previously located at the Cities Service Company/Citgo Petroleum Corporation East Chicago, Indiana facility, has been removed in accordance with the closure plan approved by Mr. Pickard. There is no longer a facility at the site.

We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


If you have questions or require additional information, please contact Ms. Beji Malek at (918) 561-3931.

Sincerely,

CITIES SERVICE OIL AND GAS CORPORATION

Bm 
J.W. Gillespie
Vice President, Technology *RB*

06/03/86



05/22/86

Patric C. Haas, P.E.

Haas & Associates Consulting Engineers
705 Franklin Square
Michigan City, IN 46360
219/872-9406

A SUBSIDIARY OF OCCIDENTAL PETROLEUM CORPORATION

DEPARTMENT OF ENVIRONMENT, MANAGEMENT

1B1
Late

INDIANAPOLIS

OFFICE MEMORANDUM

TO: RCRA File

FROM: Ted Warner *DWB for TFW*
Compliance Monitoring Section

SUBJECT: Closure Inspection Cities Service Company
East Chicago, Indiana
IND 095267381

DATE: October 1, 1986

THRU: Garry Mills *GLM*
David Berrey *DWB*

On August 15, 1986, I conducted a follow-up closure inspection of the above-referenced facility. Mr. Kenneth Robb, Terminal Manager for Citgo Petroleum Corporation, provided me with the information on Cities Service Tank No. 195. Mr. Robb explained that the tank had been removed several years earlier and that no change in the status had taken place from my previous visit of April 8, 1985, regarding the same matter. Please see the attached copy of my May 22, 1985, closure inspection of this facility.

TFW/kp
Attachment
cc: Mr. Garry Mills

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: May 22, 1985

THRU: Dave Berrey
Terry Gray

TO: Sheryl Atkins
Plan Review and Permit Section

FROM: Ted F. Warner *TFW/gds*
Compliance Monitoring Section

SUBJECT: Closure Inspection
Citgo Petroleum Corporation (Cities Service Company)
Hammond, Lake County

On April 8, 1985, I conducted a closure inspection at the above-referenced facility. Ms. Beji Malek and Mr. John Grabowski, Jr., represented the Company and provided me with a site inspection of the area where tank number 195 had been placed. I found no remaining signs of this tank, as well as no signs of soil stains.

Ms. Malek pointed out that the 149,000-gallon storage tank, number 195, had been cleaned and removed in 1982. This was the only tank used to store hazardous waste according to Ms. Malek.

I made a verbal request to Ms. Malek to submit a new closure plan and detailed certification as required by 40 CFR 265.112. Ms. Malek agreed to send in a new closure plan to our office to the attention of the Plan Review and Permit Section.

TFW/gds

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

October 15, 1986

Ms. Beji Malek
Environmental Manager
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

Mr. John S. Grabowski, Jr.
Environmental Control
Safety Coordinator
Citgo Petroleum Corporation
P.O. Box 3758
Tulsa, OK 74102

Re: Closure of Tank Storage
Notice of Compliance
Cities Service Company/Citgo
Petroleum Corporation
East Chicago, Indiana
IND 095267381

Dear Ms. Malek and Mr. Grabowski:

This letter is written to confirm the receipt of certification dated June 4, 1986, that total closure has been completed as outlined in the closure plan for Cities Service Company/Citgo Petroleum Corporation. With the receipt of this certification, closure is complete as required by 320 IAC 4.1-21.

Cities Service Company/Citgo Petroleum Corporation originally notified the U.S. EPA, Region V, as a hazardous waste storage facility with the following hazardous waste activities: tank storage. The approved closure plan indicated that the following hazardous waste activities have been eliminated: tank storage.

Based on receipt of the aforementioned certification and on an on-site inspection of the facility conducted on August 15, 1986, by Mr. Ted Warner of the Office of Solid and Hazardous Waste Management, it has been determined that Cities Service Company and Citgo Petroleum Corporation have achieved compliance with the terms of the Notice of Violation (V-114) issued on June 11, 1985.

ecology and environment
recycled paper

Ms. Beji Malek
Mr. John S. Grabowski, Jr.
Page 2

If you have any questions about this letter, please contact Mr. Garry Mills at AC 317/232-3242.

Very truly yours,



David D. Lamm
Assistant Commissioner for
Solid and Hazardous Waste Management

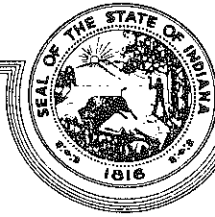
GLM/cl

cc: Lake County Health Department
Ms. Pat Vogtman, U.S. EPA, Region V
Mr. Hak Cho, U.S. EPA, Region V
East Chicago City Health Department

bcc: Mr. Jeff Stevens
Ms. Shirley Hancock
Mr. Robert Malone
Ted Warner

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

file
0521T
JC/C
late

October 15, 1986

Ms. Beji Malek
Environmental Manager
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

Mr. John S. Grabowski, Jr.
Environmental Control
Safety Coordinator
Citgo Petroleum Corporation
P.O. Box 3758
Tulsa, OK 74102

Re: Closure of Tank Storage
Notice of Compliance
Cities Service Company/Citgo
Petroleum Corporation
East Chicago, Indiana
IND 095267381

Dear Ms. Malek and Mr. Grabowski:

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Based on receipt of the aforementioned certification and on an on-site inspection of the facility conducted on August 15, 1986, by Mr. Ted Warner of the Office of Solid and Hazardous Waste Management, it has been determined that Cities Service Company and Citgo Petroleum Corporation have achieved compliance with the terms of the Notice of Violation (V-114) issued on June 11, 1985.

Ms. Beji Malek
Mr. John S. Grabowski, Jr.
Page 2

If you have any questions about this letter, please contact Mr. Garry Mills at AC 317/232-3242.

Very truly yours,



David D. Lamm
Assistant Commissioner for
Solid and Hazardous Waste Management

GLM/cl

cc: Lake County Health Department
Ms. Pat Vogtman, U.S. EPA, Region V
Mr. Hak Cho, U.S. EPA, Region V
East Chicago City Health Department

bcc: Mr. Jeff Stevens
Ms. Shirley Hancock
Mr. Robert Malone
Ted Warner

201
APR 23 1982

Mr. Jerry Wise
Indiana Waste Systems, Inc.
P.O. Box 181
Wheeler, IN 46393

Dear Mr. Wise:

Re: Disposal of Asbestos Piping Insulation
from Cities Service Company
East Chicago, Indiana

This letter acknowledges the request for disposal dated
March 24, 1982, from Cities Service Company, Tulsa, Oklahoma.

Approval is hereby granted for disposal of 600 cubic yards, one
time only, of asbestos piping insulation at the Wheeler Landfill,
OPP. No. 64-3, Porter County. The waste is to be placed with solid waste
and covered with a minimum of six inches of cover soil or solid waste
immediately.

The approval is granted subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of
the time of disposal and conditions of shipment.
2. Appropriate protective clothing should be used during handling
and disposal to ensure proper protection from exposure to the
material, especially by inhalation.
3. All asbestos must be sufficiently dampened to prevent airborne
contamination during compaction and bagged in 6 mil plastic bags.
4. Bags should be labeled with a proper warning label stating:
Caution--Contains Asbestos--Avoid Opening or Breaking
Container. Breathing Asbestos is Hazardous To Your Health.
5. If nuisance or pollution conditions are created, immediate
corrective action will be taken by the operator.
6. This approval will expire August 1, 1982.

This approval will be revoked if the landfill fails to maintain
compliance with 330 IAC 4-1, et seq. (Regulation SPC-18). Any necessary
local approval must be obtained from the Porter County Health Department.

If you have any questions, please contact Ms. Janne Ketrow of the Solid Waste Management Branch at 317/633-8550.

Very truly yours,

Ralph C. Pickard
Technical Secretary

JK/tr

cc: Mr. Bob Reeder

Mr. John Grabowski, Jr.

Porter County Health Department

Mr. David Valinetz, Air Pollution Control

bcc: Landfill File

Approval Book

tr 1688m 4/16/82

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

March 24, 1982

MAR 31 2 34 PM '82
DIV. OF LAND POLLUTION CONTROL
STATE BOARD OF HEALTH

Mr. George Oliver
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206

Re: Asbestos Waste Disposal
Permit Request

Dear Mr. Oliver:

Pursuant to our telephone conversation of February 18, 1982, this letter is to request a permit to dispose of approximately 600 cubic yards of asbestos waste material from the Cities Service Company bulk petroleum product terminal located at 2500 East Chicago Avenue, East Chicago, Indiana 46312.

As we discussed, the Company proposes to apply a water spray to the material prior to handling to avoid airborne contamination. The material then will be placed in a six (6) mil. plastic-lined container. After the container is filled the plastic liner will be sealed and transported to an authorized site for disposal. For disposal purposes the Company proposes to use the Garyland Development landfill located in Gary, Indiana. As an alternate location, please consider the Indiana Waste System's landfill in Wheeler, Indiana.

For your information, enclosed please find a plan of the terminal with the waste material location indicated.

Should you have any questions concerning this matter, please do not hesitate to contact me at 918/561-4076.

Sincerely,



John S. Grabowski, Jr.
Environmental Control and
Safety Coordinator

JSGJr:bh
Enclosure

cc: A. Neal

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

December 17, 1991

DATE:

TO: File

THRU:

FROM: John P. Naddy *JPN*
Site Investigation Section

SUBJECT: CITGO Petroleum Corp/Cities Services Co.
East Chicago, Indiana
IND095267381

Staff of the Office of Environmental Response, Site Investigation Section, have reviewed the Focused Site Inspection Prioritization Review (FSIPR), conducted by Ecology and Environment Inc., (E & E) on the above mentioned site. The site is regulated under RCRA and should receive a No Further Remedial Action Planned (NFRAP) status.



ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415

International Specialists in the Environment

M E M O R A N D U M

ESIP. N
CH
12-4-91

TO: Alan Altur, U.S. EPA
FROM: Nick Valavanis, FIT
DATE: September 11, 1991
SUBJECT: CITGO Petroleum Corp/Cities Services Co.
East Chicago, Indiana
F05-9104-053/IND095267381/FIN0217PA

CITGO Petroleum Corp/Cities Services Co. stored various petroleum products in on-site tankers. There are approximately 60 tankers on-site. The site ceased operations in 1981 and has a certified closure under RCRA dated October 16, 1986.

Because the CITGO Petroleum Corp/Cities Services Co. site is regulated under RCRA, it is recommended that E & E/FIT be issued a cease work order for this site.

7287:8

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: September 30, 1986

TO: Cities Service East Chicago Refinery File
Lake County IIIB, IND 980607469

THRU: Harry Atkinson *HQ 10/8*

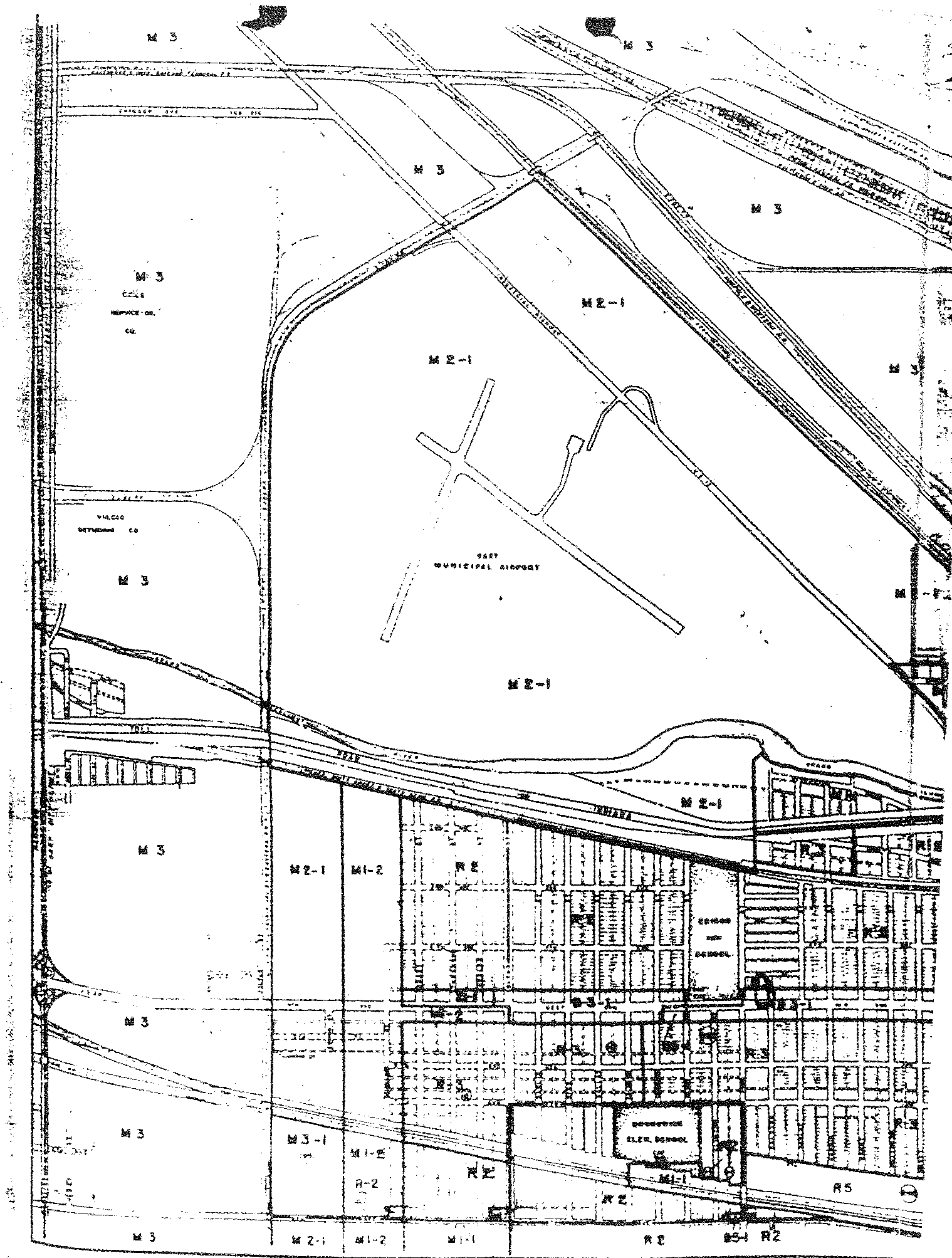
FROM: Dean J. Nygard *DJN 10.6.86*
Site Investigation Section

SUBJECT: Cities Service East Chicago Refinery Property

On September 12, 1986, I telephoned Mr. Ted Peters of Lake Service Materials to inquire about property identified as Cities Service East Chicago Refinery (IND 980607469) in a 103(c) Notification which appears on CERCLIS. After several minutes of conversation, it became apparent to me that this site may be the same site as (IND 980500151) for which a site inspection was completed October 31, 1984, by U.S. EPA/FIT. I explained to Mr. Peters that I would check this out further.

After a site visit on September 16, 1986, and a recent conversation with Mr. Ken Krueger, U.S. EPA/FIT, sites IND 980607469 and IND 980500151 are undoubtedly the same site. Further action at site IND 980607469 will not be necessary.

DJN/drc



LEGEND

- M 1-1, 1-2, 2-1, 2-2* Limited, General Manufacturing
M 3, 3-1 Heavy Manufacturing
B 1-1, 3-1, 5-1 Limited Retail, Service and Wholesale
R 1, 2, 3 Single Family Dwelling
R 5 Multiple Family Dwelling

*Numerical Code indicates criteria established by City of Gary Department of Development and Planning

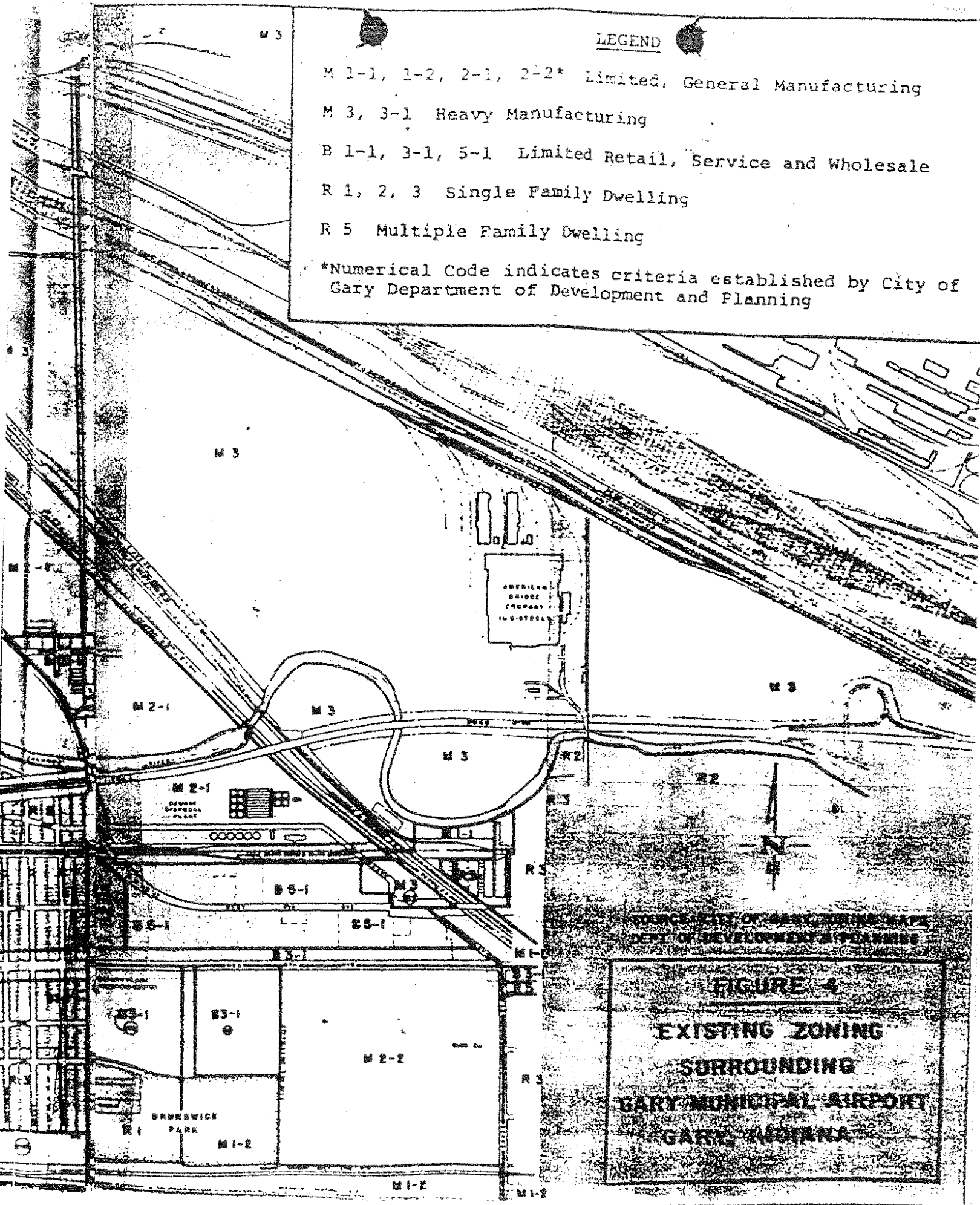


FIGURE 4
EXISTING ZONING
SURROUNDING
GARY MUNICIPAL AIRPORT
GARY, INDIANA

EXECUTIVE SUMMARY

EPA ID# IND095267381

WINDSHIELD SURVEY	X	YES	NO
-------------------	---	-----	----

Original Company Name: Cities Services Company

Revised Company Name: Citco Petroleum Company

Alias Names:

Original Address: 2500 East Chicago Ave.

Corrected X East Chicago, IN 46312

Lake County

Landfill	Generator	X	Treatment, Storage, Disposal (TSD)
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____ Transporter ____ Other:

PRIORITY ASSESSMENT:

X	HIGH	MEDIUM	LOW	NO FURTHER ACTION (NONE)
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CLASS:

I-STATE LEAD

X II-REM/FIT LEAD

State Accompanies
FIT

III-REM/FIT LEAD

Limited On-site
State Involvement

IV OTHER:

State Priority Assessment Justification: Extensive vegetation stress at this site. The storage of asbestos (12,000 cy), as well as the other potential contaminants associated with prolonged petroleum refineries usage. Has a consent decree with EPA for asbestos removal which is not being followed.

State Comments Re: PA SI Follow-up SI RPS HRS
Surface and subsurface evaluations need to be pursued before the environmental
impact can be assessed.

1. soil samples.

2. on site well sample.

3. pits, ponds or lagoons sampling.

STATE INVOLVEMENT

COMPLETE DOCUMENTS:

<u>X</u>	Preliminary Assessments
<u> </u>	Site Inspection
<u> </u>	Follow-up Site Inspection
<u> </u>	Responsible Party Search
<u> </u>	Hazard Ranking System (HRS)

REVIEW DOCUMENTS:

	Preliminary Assessments
<u>X</u>	Site Inspection
<u>X</u>	Follow-up Site Inspection
<u>X</u>	Responsible Party Search
<u>X</u>	Hazard Ranking System (HRS)

Prepared by: Stephen Gentry

Phone: (317) 243-5039

Date: 7/31/84



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IN D095267381

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) <u>Petho/eam</u> <u>Citco Corporation</u>		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER <u>2500 East Chicago Ave.</u>					
03 CITY <u>East Chicago</u>	04 STATE <u>IN</u>	05 ZIP CODE <u>46312</u>	06 COUNTY <u>Lake</u>		07 COUNTY CODE <u>89</u>	08 CONG DIST <u>1</u>	
09 COORDINATES LATITUDE <u>41° 38' 33" W</u>		LONGITUDE <u>87° 28' 19" N</u>		East Chicago topo			
10 DIRECTIONS TO SITE (Starting from nearest public road) <u>80-94 to Cline Ave. North to East Chicago Ave., west to 2500.</u>							

III. RESPONSIBLE PARTIES

01 OWNER (if known) <u>Citco Corporation</u>		02 STREET (Business, mailing, residential)			
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER <u>(219) 397-5123</u>		
07 OPERATOR (if known and different from owner) <u>The Hodges Company - Larry Hodges</u>		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☒ A. RCRA 3001 DATE RECEIVED: Interim Status MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: _____ MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

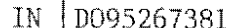
01 ON SITE INSPECTION <input type="checkbox"/> YES DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input checked="" type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR <u>1919</u> ENDING YEAR <u>1981</u> <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED <u>Inorganic (toxic, persistent)</u> <u>Organic (toxic, persistent)</u> <u>Solvents (toxic, persistent)</u> <u>Solid (toxic, persistent)</u>					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION <u>Direct Contact (population)</u> <u>Surface water (population, environment)</u>					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☒ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT <u>George Oliver</u> <u>JO 9/1/84</u>		02 OF (Agency/Organization) <u>Indiana State Board of Health</u>		03 TELEPHONE NUMBER <u>(317) 243-5038</u>	
04 PERSON RESPONSIBLE FOR ASSESSMENT <u>Stephen Gentry, Lynne Kolze</u>		05 AGENCY <u>LPC</u>	06 ORGANIZATION <u>ISBH</u>	07 TELEPHONE NUMBER <u>(317) 243-5039</u>	08 DATE <u>6, 18, 84</u> MONTH DAY YEAR



<input checked="" type="checkbox"/> A. TOXIC	<input type="checkbox"/> E. SOLUBLE	<input type="checkbox"/> I. HIGHLY VOLATILE
<input type="checkbox"/> B. CORROSIVE	<input type="checkbox"/> F. INFECTIOUS	<input type="checkbox"/> J. EXPLOSIVE
<input type="checkbox"/> C. RADIOACTIVE	<input type="checkbox"/> G. FLAMMABLE	<input type="checkbox"/> K. REACTIVE
<input checked="" type="checkbox"/> D. PERSISTENT	<input checked="" type="checkbox"/> H. IGNITABLE	<input checked="" type="checkbox"/> L. INCOMPATIBLE
		<input type="checkbox"/> M. NOT APPLICABLE



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IN D095267381

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 139,130 04 NARRATIVE DESCRIPTION
Due to sandy soil and age of facility, groundwater contamination has a high potential.
Due to age of facility, spillage during operation may contribute to serious ground water pollution problem.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 139,130 04 NARRATIVE DESCRIPTION
No surface water drainage control or treatment.

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 139,130 04 NARRATIVE DESCRIPTION
Airborne asbestos.

01 ☒ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
EPA report noted inadequate security.

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: 1/17/84) ☒ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: ~ 200 04 NARRATIVE DESCRIPTION
(Acres)
75 cy of asbestos and contaminated soil on site. Citco requested disposal. Land applied sludges. Due to the age of facility, spillage during operation may contribute to pollution.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: unknown 04 NARRATIVE DESCRIPTION
Municipal water supply in area because groundwater is polluted. Pollution migration is toward Lake Michigan, a drinking water source for 8,000,000.

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IN D095267381

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☒ ALLEGED
04 NARRATIVE DESCRIPTION

Serious vegetation stress noted on windshield survey throughout the site.

01 ☐ K. DAMAGE TO FAUNA? 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (include name(s) of species)

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
(Spills/runoff/standing liquids/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Geology is poor for on site disposal.

01 ☒ N. DAMAGE TO OFFSITE PROPERTY 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Unknown

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Unknown

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

On site disposal.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

EPA reports 8-16-80, that the seriousness of the hazards on site are high and recommended immediate action for various reasons.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 139,130

IV. COMMENTS

Civil suit under RCRA, August 25, 1980. Site is a RCRA facility. Citco was not in compliance with RCRA and cooperation.

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)

ISBH files.(Water and Land Pollution)
Past employee, "30 year employee" - Mr. Davis.
103c Notification, EPA files.

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 11-1
Late

INDIANAPOLIS

OFFICE MEMORANDUM

TO: RCRA File

FROM: Ted Warner *DWB for TFW*
Compliance Monitoring Section

SUBJECT: Closure Inspection Cities Service Company
East Chicago, Indiana
IND 095267381

DATE: October 1, 1986

THRU: Garry Mills *GLM*
David Berrey *DWB*

On August 15, 1986, I conducted a follow-up closure inspection of the above-referenced facility. Mr. Kenneth Robb, Terminal Manager for Citgo Petroleum Corporation, provided me with the information on Cities Service Tank No. 195. Mr. Robb explained that the tank had been removed several years earlier and that no change in the status had taken place from my previous visit of April 8, 1985, regarding the same matter. Please see the attached copy of my May 22, 1985, closure inspection of this facility.

TFW/kp
Attachment
cc: Mr. Garry Mills

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

TO: Sheryl Atkins
Plan Review and Permit Section

FROM: Ted F. Warner *TFW*
Compliance Monitoring Section

SUBJECT: Closure Inspection
Citgo Petroleum Corporation (Cities Service Company)
Hammond, Lake County

DATE: May 22, 1985

THRU: Dave Berrey
Terry Gray

On April 8, 1985, I conducted a closure inspection at the above-referenced facility. Ms. Beji Malek and Mr. John Grabowski, Jr., represented the Company and provided me with a site inspection of the area where tank number 195 had been placed. I found no remaining signs of this tank, as well as no signs of soil stains.

Ms. Malek pointed out that the 149,000-gallon storage tank, number 195, had been cleaned and removed in 1982. This was the only tank used to store hazardous waste according to Ms. Malek.

I made a verbal request to Ms. Malek to submit a new closure plan and detailed certification as required by 40 CFR 265.112. Ms. Malek agreed to send in a new closure plan to our office to the attention of the Plan Review and Permit Section.

TFW
TFW/gds

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

September 8, 1981

SEP 10 9 40 AM '81

SANITARY ENGINEERING
DIVISION
STATE DEPARTMENT OF HEALTH

Mr. Steve Wakefield
Solid Waste Section
Division of Sanitary Engineering
1330 West Michigan Street
Indianapolis, Indiana 46206

Re: Special Waste Disposal Permit

Dear Mr. Wakefield:

Cities Service Company wishes to apply for a permit to dispose of approximately 8,140 barrels (342,000 gallons) of oil-saturated wastes. The material was sampled, and no hazardous characteristics were present. The wastes were stored at the Cities Service bulk petroleum storage terminal, 2500 Chicago Avenue, East Chicago, Indiana, 49312. The wastes were originally generated by the abandoned refinery at this location from operations involving non-lead products and intermediates. This material needs to be disposed of as a result of our clean-up operations in this area. As our clean-up operations continue it will be necessary to apply for additional special waste disposal permits.

Most of the material is fairly thick with a composition ranging from:

24% water	to	9% water
76% oil and oil sludge	to	91% oil and water sludge

EP toxicity was performed for lead, cadmium and chromium, and all results were below detection limits. Flash point determinations yielded values of 210°F, 435°F and no flash point.

We wish to dispose of this material in the Wheeler Landfill, OPP 64-3, Porter County.

Your assistance in this matter will be appreciated. If you have any questions, please do not hesitate to contact me at 918/561-4023.

Sincerely,

Mike Chapman

Mike Chapman
Environmental Control and
Safety Coordinator

MC:bh

cc: A. Neal
J. S. Grabowski, Jr.
W. B. Meyberg
B. L. Reeder

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

October 6, 1981

OCT 3 10 12 AM '81

Mr. Steve Wakefield
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Cities Service Company - East
Chicago Petroleum Products
Terminal - Special Waste
Disposal Permit

Dear Mr. Wakefield:

This is in follow-up to our meeting of September 16.

Our current estimate of the remaining non-hazardous wastes which need to be disposed from the idle refinery site at our petroleum products terminal located at 2500 East Chicago Avenue, East Chicago, Indiana, is:

<u>Tank Bottom from Tank</u>	<u>Approximate Volume, Bbls.</u>	<u>Refinery Service</u>
126	950	Cat Cracker Feed
127	850	Rerun Distillate
128	650	Rerun Distillate
116	150	Rerun Distillate
196	300	Heavy Fuel Oil
197	300	Heavy Fuel Oil

Clean-up of Secondary

Containment for Tanks 120-128 6,750

Ash in Stack 50

10,000 or 420,000 gallons

These areas are identified on the enclosed plot plan in yellow.
Analyses are attached.

Per our letter of September 8, we requested permission to dispose of approximately 342,000 gallons at the Wheeler Landfill. We would like to increase our permit request from 342,000 to 420,000 gallons on a one-time basis at the Wheeler Landfill, OPP64-3, Porter County. These materials (except for the ash) are oil sludges and oil contaminated soil, with a composition ranging from:

Mr. Wakefield
October 6, 1981
Page 2

24% water	to	9% water
76% oil and oil sludge	to	91% oil and oil sludge

We would like to dispose of this material as soon as possible, since inclement weather will soon delay our clean-up activities until next spring. Any assistance in expediting this permit request will be greatly appreciated.

If you have any questions or comments, please do not hesitate to contact me at 918/561-4023, or at the address shown above, Room 1600 FNT.

Sincerely,



Mike Chapman
Environmental Control and
Safety Coordinator

MC:bh

Attachment

cc: A. Neal
W. B. Meyberg
B. L. Reeder
J. S. Grabowski, Jr.

Tank Bottoms from:

Tank 126

EP Toxicity for Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cd - <0.005 mg/l

Total Metal - Pb - 275 mg/kg
Cr - 0.45 mg/kg
Cd - <0.005 mg/kg

0.26% Sulphur
0.02% Chlorine
Flash Point 425°F

Tank 127

EP Toxicity - Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cd - <0.005 mg/l

Total Metal - Pb - 210 mg/kg
Cr - 0.3 mg/kg
Cd - <0.005 mg/l

0.59% Sulphur
0.01% Chlorine
Flash Point 435°F

Tank 128

EP Toxicity - Pb - 1.0 mg/l

Total Metals - Pb - 260 mg/kg
Hg - 0.002 mg/kg
Cd - <0.005 mg/kg

Total Sulphur 1.86%
Chlorine 0.02%
Flash point 200°F

Tank 116

EP Toxicity Pb - 2.0 mg/l

No Flash Point

Tank 196

EP Toxicity for Pb

2 samples - 1 liquid
1 solids

both samples - <0.1 mg/k
Total Pb - 262 mg/kg liquid
1075 mg/kg solids

Hg - 0.002 mg/l
Total Sulphur 0.59%
Total Chlorine 0.02%
Flash Point 215°F

Tank 197

EP Toxicity

Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cd - <0.005 mg/l

Total Sulphur 0.44%
Total Chlorine 0.02%
Flash Point 215°F
Total Solids 90.6%

Stack Ash

EP Toxicity

Pb - <0.1 mg/l
Cr - <0.05 mg/l

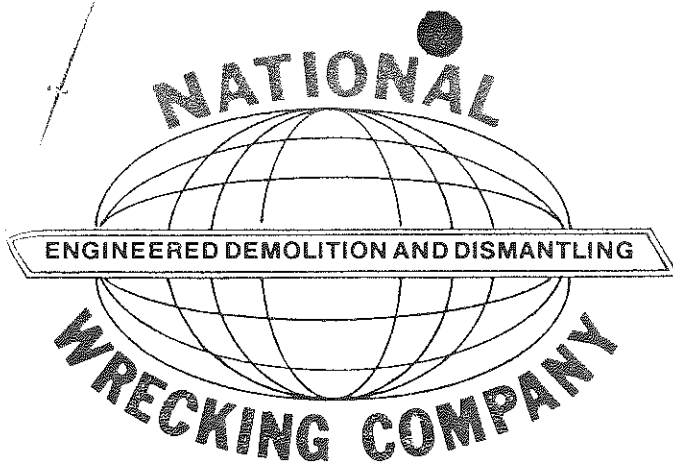
Cyanide - 0.16 mg/k

Secondary Containment

2 Samples - 1 liquid

EP Toxicity

Pb - <0.1 mg/l
Cr - <0.05 mg/l



1231 W. 42nd STREET, CHICAGO, ILLINOIS 60609

June 17, 1983

JUN 20 11 17 AM '83
DIV. OF AIR AND SOIL POLLUTION CONTROL
STATE BOARD OF HEALTH

Indiana State Board of Health
1330 West Michigan St.
P. O. Box 1964'
Indianapolis, Indiana 46206

Attn: Mr. Roy Harbert

Dear Mr. Harbert:

We have entered into an agreement with the Cities Service Company, 2500 East Chicago Ave. East Chicago, Indiana-49312 - phone 219/398-0734, to remove certain buildings and clean up certain debris.

Some quantities of the piping, boilers and debris at this location may contain friable asbestos.

We plan to wet and package any friable asbestos into plastic bags with proper warning labels and we propose to dispose of this material at the Wheeler Landfill, Wheeler, Indiana.

It is expected that we will produce approximately five to six truck loads, containing about 40 cu. yds. each, over a sixty to ninety day period.

Pursuant to the above, we are asking for your approval so we may proceed with the project.

Very truly yours,

NATIONAL WRECKING COMPANY

Archie H. Krugman
General Manager

AHK/rks

cc: Wheeler Landfill



CITGO Petroleum Corporation

Lake Charles Operations
Box 1562
Lake Charles, LA 70602

January 17, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, IN 46202

Re: Asbestos Material Disposal Permit;
Request for Extension

Dear Ms. Ruzicka:

This letter is to confirm our telephone conversation of today's date concerning the enclosed disposal permit issued to Indiana Waste Systems, Inc.

As we discussed, the Company is requesting a one (1) year extension of this approval as to permit disposal of approximately 75 cubic yards of asbestos contaminated soil from the idle refinery site located at 2500 East Chicago Avenue, East Chicago, Indiana. It is my understanding from our discussion, that a three (3) to four (4) week review period can be expected prior to granting said extension. Upon completion of your review, please inform me at the letterhead address.

In the interm, should you have any questions concerning this matter, please do not hesitate to contact me in Lake Charles, Louisiana at 318/491-6340 at your earliest convenience.

Sincerely,

John S. Grabowski, Jr.
Environmental & Safety Specialist

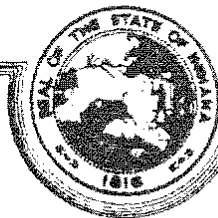
JSGJr/bm

Enclosure

xc: Messrs. C. A. Vincent, Jr.
R. V. Faith, Tulsa, OK
B. L. Reeder, East Chicago, IN
J. W. Swanson, CSOGC, Tulsa, OK
W. J. McCarthy, Dallas, TX

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

JUL 6 1983

Mr. Donald Ehmen
Indiana Waste Systems, Inc.
P.O. Box 181
Wheeler, IN 46393

Dear Mr. Ehmen:

Re: Disposal of Asbestos Waste from
Cities Service Company, 2500 E. Chicago
East Chicago, Indiana

This letter acknowledges the request for disposal dated June 17, 1983, from National Wrecking Company.

Approval is hereby granted for disposal of six (6) truck loads containing 40 cubic yards of asbestos waste at the Wheeler Landfill, OPP. No. 64-3, Porter County. The waste is to be mixed with solid waste and covered with a minimum of six inches of cover soil or solid waste immediately.


The approval is granted subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of the time of disposal and conditions of shipment.
2. Appropriate protective clothing should be used during handling and disposal to ensure proper protection from exposure to the material, especially from inhalation.
3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction and bagged in 6 mil plastic bags.
4. Bags should be labeled with a proper warning label stating:
Caution--Contains Asbestos--Avoid Opening or Breaking Container.
Breathing Asbestos is Hazardous To Your Health.
5. If nuisance or pollution conditions are created, immediate corrective action will be taken by the operator.
6. This approval will expire October 31, 1983.

This approval will be revoked if the landfill fails to maintain compliance with 320 IAC 5-1, et seq. (Regulation SPC-18). Any necessary local approval must be obtained from the Porter County Health Department.

If you have any questions, please contact Ms. Mary Janet Ruzicka of the Solid Waste Management Branch at 317/633-8527.

Very truly yours,


Ralph C. Pickard
Technical Secretary

MJR

cc: Mr. Archie H. Krugman, National Wrecking Company
Mr. David Valinetz, Air Pollution
Porter County Health Department



2DI

CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

November 9, 1984

003859
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal
Permit Request

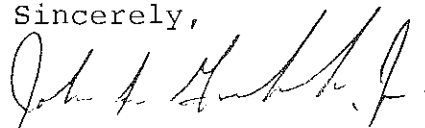
Dear Ms. Ruzicka:

This letter is in reference to my correspondence to you dated May 11, 1984 (copy enclosed).

To date the Company has not received a response to its request to dispose of approximately 1,700 cubic yards of oil-saturated dirt at the Indiana Waste Systems, Incorporated facility located in Wheeler, Indiana. A response to this request at your earliest convenience would be greatly appreciated.

Should you have any questions concerning this matter, please do not hesitate to contact me at 918/495-4764.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:mo

Enclosure

cc: Bob Faith
Jim Miller
Ancal Neal
Bob Reeder, w/encl.



CITGO Petroleum Corporation

Lake Charles Operations
Box 1562
Lake Charles, LA 70602

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary Janet Ruzicka
Solid Waste Management Branch
Environmental Management Board
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal Permit Request

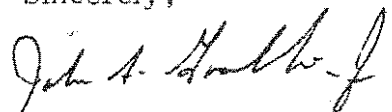
Dear Ms. Ruzicka:

This letter is to request that a permit be issued to Indiana Waste Systems, Incorporated, located in Wheeler, Indiana to dispose of approximately 1,700 cubic yards of oil-saturated dirt.

The material is located at the CITGO Petroleum Corporation bulk petroleum product terminal, 2500 East Chicago Avenue, East Chicago, Indiana. According to a waste analysis conducted by the Company, this material is not toxic pursuant to U.S. EPA EP toxicity procedures. Furthermore, the material is not suspected of containing polychlorinated biphenyls (PCB) or similar halogenated hydrocarbons.

Should you require any additional information concerning this matter, please do not hesitate to contact me in Lake Charles, Louisiana at 318/491-6340 or in Tulsa, Oklahoma after May 21, 1984 at 918/495-4764 at your convenience.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:jv



CITGO Petroleum Corporation

Box 3758
Tulsa, Oklahoma 74102

November 16, 1984

Mr. Norm Gray
Solid Waste Management Branch
Indiana State Board of Health
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Waste Disposal
Permit Request

Dear Mr. Gray:

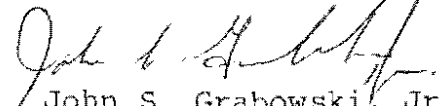
This letter is in reference to our telephone conversation of today's date concerning the Company request for a permit to dispose of approximately 1,700 cubic yards of oil-saturated dirt.

An analysis was performed on August 30, 1983 of this material pursuant to U.S. EPA EP toxicity procedures by the Company's in-house laboratory. Analytical results were reported as follows:

<u>Parameter</u>	<u>Concentration (ppm)</u>
Lead	1.70
Arsenic	0.02
Barium	2.65
Cadmium	<0.01
Chromium	0.90
Silver	<0.01
Selenium	<0.01
Mercury	0.02

Should you have any questions concerning this matter, please do not hesitate to contact me at 918/495-4764 at your convenience.

Sincerely,


John S. Grabowski, Jr.
Environmental Manager

JSGJr:mo

cc: Bob Faith
Ancal Neal
Bob Reeder

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

May 16, 1983

100

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

RECEIVED

MAY 26 1983

WASTE MANAGEMENT BRANCH
EPA REGION V

U. S. Environmental Protection Agency
ATTN: Regional Director
Region V
230 South Dearborn
Chicago, Illinois 60604

Hazardous Waste Branch
ATTN: Mr. G. Doyle, Chief
Division of Land Pollution Control
Indiana State Board of Health
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Permit Transfer Request
2500 East Chicago Avenue
East Chicago, Indiana 46312 IND095267361

Gentlemen:

Cities Service Company desires to assign and transfer certain of its assets to its wholly-owned subsidiary, CITGO Petroleum Corporation. Cities Service Company is the current operator and permittee under the following-referenced permit and requests that the permit be transferred to CITGO Petroleum Corporation to show it as the operator and permittee.

The physical operations of the facility will continue to be operated by the same personnel subsequent to the transfer as before the transfer. However, the new mailing address for CITGO Petroleum Corporation is Post Office Box 3758, Tulsa, Oklahoma 74102.

Cities Service Company will remain responsible for all permit obligations, coverage and liability in connection with the following-referenced permit and facility occurring before receipt of the necessary regulatory agency's approval with respect to the transfer of such permit and operations.

May 30, 1983, is the specific date for transfer of permit responsibility, coverage and liability between Cities Service Company and CITGO Petroleum Corporation. On said date CITGO Petroleum Corporation will assume all permit responsibility, coverage and liability in connection with the following referenced permit.

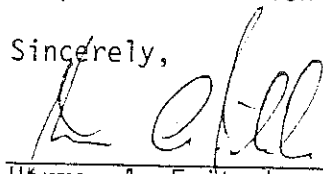
The above is applicable to the hazardous waste generator identification No. IND095267361 issued to the referenced facility.

C-30
PA
No. 30
-10

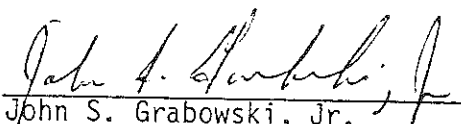
U.S. EPA
Indiana Division of Land Pollution Control
May 16, 1983
Page 2

Should you require any additional information or wish to discuss this matter further, please do not hesitate to contact John S. Grabowski, Jr., at 918/561-4076. Thank you for your prompt consideration of this matter.

Sincerely,



Herman A. Fritschen, General Manager
Safety & Environmental Services
CITIES SERVICE COMPANY



John S. Grabowski, Jr.
Environmental and Safety Manager
CITGO PETROLEUM CORPORATION

HAF/JSGJr./bh

VIA CERTIFIED MAIL

JUN 11 1985

Mr. Herman A. Fritschen
Cities Service Company
P.O. Box 300
Tulsa, OK 74102

and

Mr. John S. Grabowski, Jr.
Citgo Petroleum Corporation
P.O. Box 3758
Tulsa, OK 74102

Dear Messrs. Fritschen and Grabowski:

Re: RCRA Closure Record Review
Cities Service Company
Citgo Petroleum Corporation
IND 095267381
Notice of Violation (V-114)

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. In addition to RCRA requirements, facilities are being inspected to determine compliance with Environmental Management Board 320 IAC 4, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

This letter is to inform you that on July 25, 1984, a record review of Citgo Petroleum Corporation, previously owned and operated by Cities Service Company, located at East Chicago, Indiana, was conducted by Ms. Sheryl Atkins of the Division of Land Pollution Control, Indiana State Board of Health.

Pursuant to the above-referenced record review, it has been determined that Cities Service Company closed the hazardous waste storage portion of their East Chicago facility without an approved hazardous waste closure plan. Since closure, Cities Service Company submitted two (2) letters, one to the U.S. EPA, Region V, and one to the Indiana State Board of Health providing information about closure. The letters

were not adequate to document compliance with the RCRA and 320 IAC 4 closure plan requirements. Company ownership and interim status was transferred to Citgo Petroleum Corporation on May 30, 1983.

The following violation of RCRA and 320 IAC 4 pertaining to the operation of the facility was noted:

- | | |
|--|---|
| 1. 40 CFR 265.112(c)
and
320 IAC 4-7 | Cities Service Company and Citgo Petroleum Corporation failed to submit a RCRA closure plan to the Technical Secretary of the Environmental Management Board at least one hundred eighty (180) days prior to the date of closure of the hazardous storage portion of the East Chicago facility. |
|--|---|

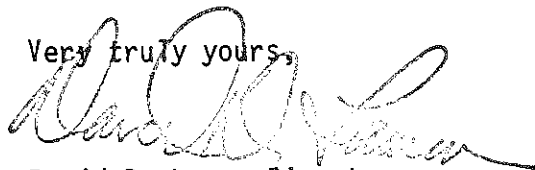
Cities Service Company and Citgo Petroleum Corporation, within thirty (30) calendar days of receipt of this letter, shall achieve compliance with the following requirements:

1. Submit a detailed approvable closure plan to the State for closure of the hazardous waste storage portion of the facility. The plan must be in conformance with 320 IAC 4-7 (40 CFR 265.110 through 40 CFR 265.115). The plan shall specifically address:
 - a. When closure of the hazardous waste storage area occurred at the facility.
 - b. How and where the tank, other storage equipment, lines, and removal equipment were decontaminated and disposed of.

Failure to respond adequately to this Notice of Violation and verify a return to compliance at this facility will result in escalated enforcement action.

Please direct your response to this letter and any questions to Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, at AC 317/243-5052.

Very truly yours,



David D. Lamm, Director
Division of Land Pollution Control

RDM/tr
cc: Lake County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Ms. Sheryl Atkins
tr 7082m 6/4/85

Tank Bottoms from:

Tank 126

EP Toxicity for Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cd - <0.005 mg/l

Total Metal - Pb - 275 mg/kg
Cr - 0.45 mg/kg
Cd - <0.005 mg/kg

0.26% Sulphur
0.02% Chlorine
Flash Point 425°F

Tank 127

EP Toxicity - Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cd - <0.005 mg/l

Total Metal - Pb - 210 mg/kg
Cr - 0.3 mg/kg
Cd - <0.005 mg/l

0.59% Sulphur
0.01% Chlorine
Flash Point 435°F

Tank 128

EP Toxicity - Pb - 1.0 mg/l

Total Metals - Pb - 260 mg/kg
Hg - 0.002 mg/kg
Cd - <0.005 mg/kg

Total Sulphur 1.86%
Chlorine 0.02%
Flash point 200°F

Tank 116

EP Toxicity Pb - 2.0 mg/l

No Flash Point

Tank 196

EP Toxicity for Pb

2 samples - 1 liquid
1 solids

both samples - <0.1 mg/k
Total Pb - 262 mg/kg liquid
1075 mg/kg solids

Hg - 0.002 mg/l
Total Sulphur 0.59%
Total Chlorine 0.02%
Flash Point 215°F

Tank 197

EP Toxicity

Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cd - <0.005 mg/l

Total Sulphur 0.44%
Total Chlorine 0.02%
Flash Point 215°F
Total Solids 90.6%

Stack Ash

EP Toxicity

Pb - <0.1 mg/l
Cr - <0.05 mg/l
Cyanide - 0.16 mg/k

Secondary Containment

2 Samples - 1 liquid

EP Toxicity

Pb - <0.1 mg/l
Cr - <0.05 mg/l